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ABSTRACT

Montana's Advisory Committee to the U.S. Commission on Civil Rights investigated the effects of Montana's television and newspaper media on minorities and women. Focus was on the employment opportunities in and the images projected by the media. Interviews were conducted with management and staff of newspapers, news services, and television stations; faculty and students from the University of Montana and Montana State University; and other individuals and groups interested in media-related issues. Additional data were obtained at a 1-day conference held in Missoula to explore further issues relating to minorities and women and the media. Conference participants included representatives from TV stations in Great Falls and Missoula and newspapers from Great Falls, Butte, Billings, Helena, and Missoula. Relevant information was supplied by media representatives who did not attend. Findings included: minorities, specifically Native Americans, and women were underemployed and underrepresented in both television and the written news media; many newspapers printed articles concerning women which were biased and tended to depict them in traditional sex-stereotyped roles or in a negative fashion whenever women did not fit traditional sex roles; and reporting of news concerning both women and minorities was often unbalanced, stereotyped, or not reported. (NQ)

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ITS EFFECTS ON MINORITIES AND WOMEN

EP 1.14

A report of the Montana Advisory Committee to the United States Commission on Civil Rights prepared for the information and consideration of the Commission. This report will be considered by the Commission, and the Commission will make public its reaction. In the meantime, the findings and recommendations of this report should not be attributed to the Commission but only to the Montana Advisory Committee

June 1976

RC009469

THE MEDIA IN MONTANA:

ITS EFFECTS ON MINORITIES AND WOMEN

--A report prepared by the Montana Advisory Committee to the U.S. Commission on Civil Rights.

ATTRIBUTION:

The findings and recommendations contained in this report are those of the Montana Advisory Committee to the United States Commission on Civil Rights and, as such, are not attributable to the Commission.

This report has been prepared by the State Advisory Committee for submission to the Commission, and will be considered by the Commission in formulating its recommendations to the President and the Congress.

RIGHT OF RESPONSE:

Prior to the publication of a report, the State Advisory Committee affords to all individuals or organizations that may be defamed, degraded, or incriminated by any material contained in the report an opportunity to respond in writing to such material. All responses received have been incorporated, appended, or otherwise reflected in the publication.

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LETTER OF TRANSMITTAL

MONTANA ADVISORY COMMITTEE
TO THE U.S. COMMISSION
ON CIVIL RIGHTS
June 1976

MEMBERS OF THE COMMISSION
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Sirs and Madam:

The Montana Advisory Committee submits this report pursuant to its responsibility to inform the Commission about civil rights problems in this State.

During our investigation, which included a 1-day conference in Missoula, Mont., April 12, 1975, we examined the effects of the television and newspaper media on minorities and women in terms of employment and image-making. From prior field interviews and information presented at the media conference the Advisory Committee determined that minorities and women are underrepresented in visible and/or decision-making positions in the television and newspaper industries. The Advisory Committee concerned itself with imagery to the extent that false or misleading imagery may convey derogatory misconceptions of minorities and women. The Advisory Committee found that misleading images of minorities and women contribute to or reinforce in the public mind distorted beliefs about these groups.

The discriminatory employment practices and stereotyped images projected by the television and newspaper media in the State have a particularly adverse effect on Native Americans since they constitute 70 percent of the minority population.

At Montana television stations, Native Americans and other minorities are absent from on-camera positions. None of the

five major dailies in the State employs minority men or women as news reporters or editorial writers. This report also documents that nonminority women occupy few of the decisionmaking positions at newspaper and television stations.

Based on findings of our study, we are urging the Federal Communications Commission and the Equal Employment Opportunity Commission to establish alternative reporting forms for the exclusive use of the media industry. Alternative forms would facilitate accurate reporting of cross-tabulated race, sex, and job classifications of employees and strengthen affirmative action plan monitoring by the Federal Government.

We are also asking that media interest groups combine their efforts to form a Montana Press Council which would be a self-monitoring mechanism for local newspapers and television stations with regard to equal employment and true image projection.

This report on the media in Montana is the first of its kind ever undertaken by a State Advisory Committee. We request that you, as the chief officials of the U.S. Commission on Civil Rights, urge the Federal agencies indicated in this report to strengthen rules and adopt guidelines which would eliminate the stereotyped images and underutilization of minorities and women employed at all levels in the media.

Respectfully,

/s/

HELEN PETERSON
Chairperson

ACKNOWLEDGMENTS

The Montana Advisory Committee wishes to thank the staff of the Commission's Mountain States Regional Office, Denver, Colo., for its help in the preparation of this report.

The investigation and report were the principal staff assignment of Norma Jones, with writing and review assistance from Grace Buckley, William Levis, and Rebecca Marrujo, and support from Esther Johnson and Phyllis Santangelo. The project was undertaken under the overall supervision of Joseph T. Brooks, acting director, and Dr. Shirley Hill Witt, director, Mountain States Regional Office.

The final production of the report was the responsibility of Audree B. Holton and Vivian Hauser, supervised by Bobby Wortman, in the Commission's Publications Support Center, Office of Management.

Preparation of all State Advisory Committee reports is supervised by Isaiah T. Creswell, Jr., Assistant Staff Director for Field Operations.

THE UNITED STATES COMMISSION ON CIVIL RIGHTS

The United States Commission on Civil Rights, created by the Civil Rights Act of 1957, is an independent, bipartisan agency of the executive branch of the Federal Government. By the terms of the act, as amended, the Commission is charged with the following duties pertaining to denials o the equal protection of the laws based on race, color, sex, religion, or national origin, or in the administration of justice: investigation of individual discriminatory denials of the right to vote; study of legal developments with respect to denials of the equal protection of the law; appraisal of the laws and policies of the United States with respect to denials of equal protection of the law; maintenance of a national clearinghouse for information respecting denials of equal protection of the law; and investigation of patterns or practices of fraud or discrimination in the conduct of Federal elections. The Commission is also required to submit reports to the President and the Congress at such time as the Commission, the Congress, or the President shall deem desirable.

THE STATE ADVISORY COMMITTEES

An Advisory Committee to the United States Commission on Civil Rights has been established in each of the 50 States and the District of Columbia pursuant to section 105(c) of the Civil Rights Act of 1957 as amended. The Advisory Committees are made up of responsible persons who serve without compensation. Their functions under their mandate from the Commission are to: advise the Commission of all relevant information concerning their respective States on matters within the jurisdiction of the Commission; advise the Commission on matters of mutual concern in the preparation of reports of the Commission to the President and the Congress; receive reports, suggestions, and recommendations from individuals, public and private organizations, and public officials upon matters pertinent to inquiries conducted by the State Advisory Committee; initiate and forward advice and recommendations to the Commission upon matters in which the Commission shall request the assistance of the State Advisory Committee; and attend, as observers, any open hearing or conference which the Commission may hold within the State.

"The problem won't go away in the media until it goes away in all of America. It therefore follows that to have a truer balance of content, a better sensitivity ...they (minorities and women) must be in a position to be heard and seen in the media."

Excerpt from Minorities and the Media, Ford Foundation Report, November 1974

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I. BACKGROUND

> The media of communications in America are not all-powerful but they are powerful enough. A paragraph on the front page of one of the daily newspapers, a TV camera's focus on the face of a candidate, can make or break him [her] at the polls. So the media are forever cussed and discussed, and if they disappeared, one of the most pervasive forces shaping our society would be gone.[1]

The broadcast media (television and radio) and the written media (newspapers and magazines) have become major transmitters of cultural standards, myths, values, roles, and images, reaching people of every socioeconomic status. Virtually every American household has at least one television set. The "typical" viewer watches 3.5 hours per day, 2.4 hours of which are from 6:00 p.m. until midnight.[2] In 1974, 97 percent of U.S. homes received at least one newspaper a day and 75 percent subscribed to at least one news magazine or magazine of national events.[3] Because of such wide-reaching exposure, the written and electronic media have tremendous image-making impact.[4]

In 1972, however, the Federal Communications Commission (FCC) conducted a study which revealed that only about 1 in 10 broadcast employees was a member of "one of four key minority groups - black, Oriental, Native American, and Spanish surnamed American." The results of this study and several others prompted the Montana Advisory Committee to the U.S. Commission on Civil Rights to become concerned about numerous media issues associated with minorities and women in their State. The overall purpose of the Advisory Committee's media project in Montana is to create an awareness on the part of the media industry, the minority community, and the general public of the importance of access to the media by all segments of the population and the need for change in existing practices and attitudes within the media industry.

The Advisory Committee focused its attention on newspapers and television stations in the State. Two major issues are employment opportunities and the images projected in the media of minorities and women. These are the focus

of a media study which the Advisory Committee began in December 1974. Radio stations in Montana are generally small. They were not included within the scope of this initial media study. Although the listening audience is substantial, they offer few employment opportunities and their image-making impact may be minimal.

Prior to developing this report, Commission staff and Montana Advisory Committee members conducted several months of interviews in Montana of management and staff of newspapers, news services, and television stations. Other nonmedia persons were also interviewed, including faculty and students from the University of Montana, Montana State University, and numerous other individuals and groups interested in media-related issues.

On April 12, 1975, the Advisory Committee sponsored a 1-day conference on the media, which was held in Missoula. Its purpose was to explore further issues relating to minorities and women and the media, to air them in a public forum, and to gather additional information for a report. Representatives from all television stations and major newspapers in the State were invited to attend, as were many other interested persons and groups. TV stations in Great Falls and Missoula sent representatives to the conference, as did newspapers from Great Falls, Butte, Billings, Helena, and Missoula. Those media representatives who did not attend supplied the Advisory Committee with relevant information. Total conference participants, including panelists, workshop moderators, and audience, totaled 100 to 150 persons.

Notes to Chapter I

1. Karen DeWitt, "The Economics of the Black Media," Black Enterprise, vol. 5, no. 2, September 1974, p. 17.

2. Broadcasting Yearbook, 1974, p. 69.

3. DeWitt, "Economics of Black Media," p. 18.

4. David Holbrook, "Media Reflection," Federal Communications Commission News, vol. XXI, June 26, 1973.

II. OVERVIEW OF THE MEDIA IN MONTANA

In one of the most colorful and controversial chapters of Inside U.S.A.,[1] John Gunther reported that during the early 1900's Anaconda Copper Company had "a constrictorlike grip on much that goes on in Montana." Anaconda began to relax its grip in the 1930's, but until that time the company controlled almost all elections, dragging in the "cemetery vote" where necessary. Anaconda also owned most of the newspapers of Montana, thus stifling public debate and offering Montana only a homogenized, sanitized view of the State and the world. Dissent was so frowned upon that letters to the editor were never printed.[2]

A vital ally of Anaconda was the Montana Power Company. Often the two were referred to as "the Twins" or simply as "the Company." Their close union was symbolized by interlocking directorates and their use of the same legal counsel.

Widespread and positive change in Montana began in the early 1930's when W. H. Hoover assumed the presidency of Anaconda. However, forces more powerful than personalities were also causing Anaconda to change. It was becoming a massive corporation, and new economic forces, oil and timber among them, changed the economic complexion of the State and thus changed Anaconda.[3] Ownership of the newspapers became more of an embarrassment than a source of strength to the company. In 1959 the papers were sold to the Iowa-based Lee chain and for the first time in more than half a century, Montana had a legitimate, free press.

Today, national chains own many Montana newspapers. Nationally, chain newspapers hold 60 percent of the daily newspaper circulation. In Montana, chain ownership among the 13 dailies is even more extensive. The proportion of daily circulation held by chain newspapers is more than 95 percent.[4] Lee newspapers operate in Butte, Helena, Missoula, and Billings. The Cowles chain, headquartered in Minneapolis, owns the Great Falls Tribune; Scripps-Howard owns the dailies in Bozeman and Havre.

The concentration of ownership among Montana's 12 television stations is similar. Western Broadcasting

Company owns stations in Kalispell and Missoula and a satellite station[5] in Butte; the Montana Television Network owns stations in Butte, Billings, and Great Falls, and a satellite in Missoula. Harriscope owns stations in Billings and Great Falls. In addition, virtually all television cable service in Montana's major population centers is owned by Teleprompter, the largest TV cable company in the Nation, or by Community Telecommunications, Inc. There are independent stations in Glendive, Helena, and Miles City.

The Montana media, particularly the major newspapers, are very different than they were 15 years ago. In 1972 remarks before the Montana Committee for the Humanities, Jerry Holloron, former Montana bureau chief for Lee Newspapers, said, "I fear that the fact that the Montana press is a lot better than it used to be is being used as an excuse for the fact that the Montana press is not nearly as good as it could or should be." He went on to say:

> Chain ownership allows expenditures for news coverage that otherwise would be impossible. A chain newspaper, so the theory goes, also has greater financial resources with which to weather periods of local financial distress....

Although chain ownership of the media in Montana has these advantages, Mr. Holloron also expressed his concern regarding its disadvantages:

> I think we must fear this statewide trend toward group ownership of the media...at its worst, chain ownership of the Montana media could mean chain control of news and editorial policy. In short, it could mean a return to Anaconda Company journalism.[6]

His comment about the return to "Anaconda Company journalism" is also reflected in the views expressed about media accountability. The Anaconda Company type of journalism remained accountable only to the Anaconda Company, but today the media seeks to be accountable to the public it serves.

Many journalists firmly believe in active competition in terms of accurate, "hardhitting," and "solid" reporting.[7] Such competition exists in Montana. For example, the Great Falls Tribune and the Lee newspapers have a healthy

competition for coverage of State government and legislative activities.

Mike Voeller, editor of the Independent Record, stated at the Montana Advisory Committee's conference that the role of the newspaper "is simply to mirror the community, to print what's going on." (transcript, p. 77)[8] Montana's media does "mirror" some segments of the community. However, its coverage of all segments was questioned by Jerry Holloron in his concluding remarks before the Montana Committee for the Humanities:

> I don't think that we -- and I include myself -have done an adequate job of discussing the real problems facing Montana Indians, the Montana consumer, the Montana poor, the Montana resident who watches with impotence as his [sic] environment is polluted or stripped away.[9]

In addition, Jerry Holloron's article in the Montana Journalism Review reported that most Montanans live in one-newspaper towns, and radio and television in the State, with few exceptions, are not providing in-depth coverage of controversial State and local issues.[10] Today in Montana, some of the local issues involve problems confronting minorities and women. The Montana Advisory Committee is concerned with these issues and also with the question of the accurate reporting of such issues or the failure to report them at all. (transcript, p. 106)

Notes to Chapter II

1. John Gunther, Inside U.S.A. (New York: Harper and Row, 1947 & 1951).

2. Neal R. Pierce, The Mountain States of America, (New York, W. W. Norton & Co., 1972), p. 95.

3. Ibid., p. 96.

4. Jerry Holloron, "Montana's Media: Area for Improvement" (speech before the Montana Committee for the Humanities, December 1972), Montana Journalism Review (University of Montana School of Journalism), no. 17, 1974.

5. A satellite station is a transmitter used to bring signals to a community from a television station in another community.

6. Holloron, "Montana's Media," p. 96.

7. Ibid.

8. Page numbers in parentheses cited here and hereafter in text refer to statements made at the Montana Advisory Committee's conference on the media April 12, 1975, as recorded in the official transcript of that conference.

9. Jerry Holloron, "Montana's Media: Area for Improvement."

10. Ibid.

III. EMPLOYMENT OF MINORITIES AND WOMEN IN THE MEDIA

Legal Background for Equal Employment Opportunity

Equal employment opportunity, the right of all persons to work and to advance on the basis of merit and ability, has deep roots in our American heritage. For many years, this right has been severely restricted by discriminatory employment practices operating against various groups in our society. Congress established a legal basis for equal employment in the Civil Rights Act of 1964, with strengthening amendments added in 1972.[1] Title VII of the act prohibits discrimination because of race, color, religion, sex, or national origin in all employment practices, including, hiring, firing, promotion, compensation, and other conditions of employment. The Equal Employment Opportunity Commission (EEOC) was created to enforce Title VII and to assure equal treatment for all persons in employment.

When equal employment laws were first enacted, it was generally believed that discrimination took place primarily through conscious, overt actions against individuals; therefore these laws expressly prohibited such actions, and to some degree overt discrimination has declined.[2] However, destructive, persistent employment discrimination remains, confirmed by statistical data on higher unemployment and underemployment. Nationally, underemployment figures show that in 1973 while 33.6 percent of the employees in the entire work force held white collar, nonclerical jobs, only 12.2 percent of the blacks and 15.2 percent of persons of Spanish-speaking background in the work force held these positions. Conversely, 49.1 percent of the blacks and 48.5 percent of the persons of Spanish-speaking background held blue collar, semiskilled and unskilled jobs, while the overall percentage for these positions was 29.9 percent. Similarly, women constituted approximately 30 percent of the work force, but only 26 percent of women employed occupied white collar nonclerical positions, while 37.8 percent of the men in the work force held such jobs.[3]

The lower incomes nationally of minorities and women are indications that they are still denied access to equal employment opportunities. In 1970 the median incomes for minority groups were lower in each instance than whites

whose median income was $9,961; the median income of blacks was $6,067, Spanish-surnamed Americans, $7,534, and Native Americans, $7,323. Comparably the median income for white women was $2,516, whereas that of white men was $6,863.[4]

Much discrimination persists through intentional acts. But the most pervasive discrimination today results from accepted, often unintentional, and seemingly neutral practices in the employment process. Employment systems perpetuate discriminatory effects of past discrimination even when original discriminatory acts have ceased, thus creating unequal opportunities for many minorities and women.[5] For example, the United States Supreme Court held in Griggs v. Duke Power that a seemingly neutral job requirement that all employees be high school graduates had a disparate effect on black applicants.[6] The Court found that fewer blacks had high school diplomas than whites. The Court ordered the company to stop using the job qualification unless and until it could show by professional validation studies that the diploma was job-related. Identification and elimination of such systemic discrimination resulting from regular employment practices are the major emphases of equal employment efforts today.

Statistics by themselves may not show intentional discrimination, but they may reveal that minorities and women are disproportionately represented in some job classifications. For example, women of all races might be overrepresented in clerical positions and underrepresented in managerial positions, and minority men overrepresented in service occupations and underrepresented in professional occupations. Statistics which show such patterns constitute strong evidence of discriminatory effects.

Employment practices with regard to minorities and women at television stations are regulated by both the Federal Communications Commission (FCC) and the Equal Employment Opportunity Commission (EEOC). The newspaper industry does not operate under a regulatory agency such as the FCC. Rather, equal employment opportunity by newspapers is enforced by EEOC alone.

Many State and local government laws also prohibit employment discrimination. When EEOC receives discrimination charges, it defers them for a limited time period to certain State and local agencies. Such is its procedure with the Montana Human Rights Commission.

The State Human Rights Commission was established by the 43rd Legislative Assembly in 1974, and its Human Rights Bureau enforces the Montana Fair Employment Practice Act, last amended effective July 1, 1974.[7] The act prohibits employment discrimination based on race, religion, color, national origin, age, physical or mental handicap, and sex. The Human Rights Bureau is also responsible for investigating and conciliating discrimination complaints within Montana.

Newspaper Employment in Montana

Employment Data

Figures from the 1970 census indicate that 694,409 people live in Montana. Of these 35,738 (5 percent) are Native Americans, Spanish-surnamed, or black. Native Americans comprise the largest proportion of these minority group persons (26,094 or 73 percent), followed by Spanish-surnamed (7,771 or 22 percent), and black (1,873 or 5 percent).[8] There are 9,077 minority members in the civilian work force and 1,318 (14.5 percent) of these are unemployed, as compared to 5.8 percent unemployed nonminorities.[9]

Thirty-seven percent (91,589) of the workers in the Montana labor force are women and 6.8 percent (6,215) are unemployed. Women hold proportionately fewer, 8 percent (20,030), of the more prestigious professional and managerial positions. Minority women are even less represented, only 0.2 percent (494) in professional fields, although they constitute 35 percent of the minority labor force, 2 percent of the civilian labor force, and 3.5 percent of the female labor force.[10]

Employment information regarding the number of minorities and women on the staff of several newspapers in the State was made public at the Montana Advisory Committee's conference on the media. The State Advisory Committee determined that data on the civilian labor force and the unemployment rate should be presented for a three-county area. These areas assure a wider geographical area of recruitment of minorities by employers and a commuting radius of approximately 60 miles.

According to representatives for Lee newspapers, the Montana Standard in Butte employs 80 persons. Of 16 professionals, 5 are women and 2 are Native American males;

of 8 department heads, 1 is a woman. They employ a total of 4 Native Americans who constitute 5 percent of their work force. Professional women are 30 percent of their professional employees.

The Billings Gazette is one of four Montana newspapers owned by the Lee newspaper chain. As of March 1975, the Gazette employed 182 persons--125 men (69 percent) and 57 women (31 percent). Only 2 women are in management positions and 10 are in professional positions. Of the newsroom's 45 employees, 18 (40 percent) are women. Over half of the women hold clerical positions. There is only one woman editor, compared to five men, but a good representation among the 14 reporters, half of whom are women.[11]

The Billings Gazette has only 10 (6 percent) minority members on its staff of 182, only one minority male in a professional position, and none in decisionmaking positions. Only one minority member, a man, holds one of the nine trainee positions, a blue collar production position. Of the five minority women, all hold clerical, services, or sales jobs.[12] The following chart shows a breakdown of employees by minority status and sex.

Billings Gazette

Occupation	Total	White		Minority	
		Men	Women	Men	Women
Professional	25	14	10	1*	0
Officials & Managers	30	28	2	0	0
Technicians	6	5	1	0	0
Sales Worker	14	8	5	0	1**
Office & Clerical	44	10	31	0	1* 2**
Craftsman	43	38	2	2* 1**	0
Operatives	15	14	0	1**	0
Laborers	1	1	0	0	0
Unskilled	4	2	1	0	1**
Total	182	120	52	5	5

*Native American
**Spanish Origin

The city of Billings is surrounded by the three counties of Yellowstone, Carbon, and Big Horn. According to U.S. Department of Labor statistics, these counties have an available labor force of 40,837, of whom 2,315 or 5.6 percent are unemployed. The three-county area has 14,906 women in the available labor force, of whom 1,002 or 7 percent are unemployed. Within the tricounty labor force,

there are 1,245 minority group persons, overwhelmingly Native Americans, of whom 121 or 9.7 percent are unemployed.[13]

The Missoulian is another of the four newspapers owned by the Lee chain that presented employment information to the Advisory Committee. As of April 1974, the Missoulian employed 94 persons. The three top editorial positions (editor-in-chief, executive editor, and city editor) are held by white men. Eight of 11 news reporters are white women. The Missoulian has a three-person bureau in Helena, the State capitol, to cover State government. Its staff is all white male. The Missoulian's five-person Flathead Bureau, located in Kalispell, covers the northern part of western Montana. The Flathead Bureau chief is a white woman. (transcript, p. 76)

The Missoulian editor stated that "...we have one employee who is a part American Indian (male) who is the fourth-ranking person in the newsroom" (a feature editor). (transcript, p. 73) The Missoulian employs no minority men or women in any of its 11 news reporter positions. The following chart shows the Missoulian work force by minority status and sex.

Missoulian

Occupation	Total	White		Minority	
		Men	Women	Men	Women
Professional	25	14	9	1*	1*
Officials & Managers	9	8	1	0	0
Technicians	3	3	0	0	0
Sales Worker	16	7	9	0	0
Office & Clerical	10	1	8	0	1*
Craftsman	25	21	3	1*	0
Operatives	4	4	0	0	0
Laborers	2	2	0	0	0
Unskilled	0	0	0	0	0
Total	94	60	30	2	2

*Native American

The city of Missoula is surrounded by Lake, Missoula, and Ravalli counties.[14] As of 1972, 7 percent of the 33,186 persons in the civilian labor force were unemployed. The area has 11,982 women in the available labor force, of whom 924 or 8 percent are unemployed. In addition, 1,288 minority group persons, mainly Native Americans, are in the area labor force and 469 or 36.4 percent of those are unemployed.[15]

The Great Falls Tribune, the only major paper not owned by Lee newspapers, is also the only one in the State whose employees are unionized. The Tribune employs approximately 195 persons, of whom 42 (22 percent) are women. The top four editorial positions are held by white men. The news reporting staff consists of 27 persons, one-third of whom are white women. The Tribune employs no minority reporters, nor are minorities represented at any decisionmaking level on the paper.[16] The paper employs one minority male in a blue collar occupation. The following chart is a breakdown by minority status and sex of the work force.

Great Falls Tribune

Occupation	Total	White		Minority	
		Men	Women	Men	Women
Professional	2	1	1	0	0
Officials & Managers	16	16	0	0	0
Technicians	1	0	1	0	0
Sales Worker	22	19	3	0	0
Office & Clerical	70	37	33	0	0
Craftsman	49	47	1	1*	0
Operatives	33	30	3	0	0
Laborers	0	0	0	0	0
Unskilled	2	2	0	0	0
Total	195	152	42	1	0

*Spanish Origin

Great Falls is surrounded by the three counties of Cascade, Teton, and Chouteau. These counties have a labor force of 32,767 persons with 1,945 or 6 percent unemployed. There are 12,159 women in the available labor force, of whom 944 or 7 percent are unemployed. In addition, 1,196 minorities, overwhelmingly Native Americans, are in the labor force with 323 or 27 percent unemployed.[17]

The Associated Press, one of two news services in Montana, is located in Helena. The AP is the world's largest news gathering organization, operating in 106 countries and every State in the United States. The Helena-based AP is a small operation with decisionmaking responsibility primarily in the hands of the white male bureau chief, Paul Freeman, and six full-time staff

reporters. Three of these are white women. None of the reporters is a minority. (transcript, p. 102) Mr. Freeman suggested that, although available labor force information is not particularly pertinent because of the small number of available decisionmaking positions, there is a need for additional staff:

> Counting myself, seven AP reporters, full-time reporters, are charged with covering an increasing, a hugely increasing diet of news in the State. State government has expanded by roughly double. The amount of coverage needed in fields including the fields of news of women and minorities has at least doubled. The amount of even sports coverage in this State has at least doubled; the AP staff has remained the same. (transcript, p. 79)

Several conference participants suggested that at such time when the AP staff can be expanded, the hiring of minorities would be crucial. (transcript, pp. 103, 116) One conference participant said, "The questions you should be asking yourselves and your staff in a rhetorical sense, is why we do not have Indian newspaper reporters on our staff." (transcript, p. 119)

On the national level the Wire Service Guild, which represents about 1,300 AP employees across the country, has charged the AP with employment discrimination on the basis of race and sex in a complaint filed in 1974 with the EEOC. The guild charged discrimination in hiring, recruitment, training, and promotion opportunities. Figures cited by the guild show only 20 blacks in news positions throughout the country.[18] Of the 170 women employed by AP, 120 are in news classifications, with no women serving as general executives, bureau chiefs, or foreign correspondents. Of the 75 domestic correspondents, only two are women.[19]

Job level employment statistics on minorities and women are important in any inquiry into employment opportunities. However, it is equally important to go beneath the surface of the data and figures, as has been stated in Griggs v. Duke Power Co.[20] The message conveyed by this and other legal rulings[21] is clear: if a statistical survey shows that minorities and women are not participating in an employer's work force at all levels in reasonable relation to their presence in the population and the labor force, the

burden of proof is on the employer to show that this is not the result of discrimination, however inadvertent.[22]

Newspaper representatives at the Montana Advisory Committee conference expressed the belief that statistics by themselves should not be used to measure the newspapers' intentions regarding the employment status of minorities and women. The Advisory Committee, therefore, raised questions about training programs, job responsibilities, recruiting, and affirmative action in general. In many instances, the Advisory Committee heard the response familiar for so long to those who have championed equal employment opportunity, that it is so difficult to find qualified minority and female applicants.

"Actually, I believe that it is not the newspaper that has to deal with it; because as far as I know, the newspaper has had no applicant, you know, application from minority women who are qualified to do the job," said Pam Swiger, a swing editor for the Montana Standard. (transcript, p. 90) Ms. Swiger's statement that "it is not the newspaper that has to deal with it," however, indicated an inaccurate perception of Federal law.

Training Programs

Employers allege that they are unable to find minorities or women who are qualified. This raises a major question: How do minorities and women become qualified and how is "qualified" defined?

The University of Montana School of Journalism is the primary training facility for journalists in the State and is the only university in the State with a school of journalism. Edward Coyle, editor of the Missoulian, said, "We have on our staff 15 people who are graduates or have been students at the University of Montana. We draw heavily on the journalism school here." (transcript, p. 117)

Minority students, however, are underrepresented at the University of Montana's School of Journalism. Dean W. J. Brier said, "I joined the Montana faculty in 1962 and if my facts are correct, only two Native Americans have been graduated from the journalism school in that period." (transcript, p. 261) Dean Brier said that "few blacks and especially few Native Americans are becoming qualified to work for the news media.... When they do become qualified,"

he emphasized, "that is, when they obtain a college degree, they consistently have done very well." (transcript, p. 261) It must be noted that based on Griggs v. Duke Power and subsequent cases, once it is shown that a job requirement such as a college diploma has a disparate effect on minority employment it is up to the employer to demonstrate by professional means that the job qualification is a business necessity.

According to Mr. Coyle, general qualifications for a news reporter include a good working knowledge of the English language, expertise in some field--economics, environment, politics, or the courts and the ability to structure sentences and convey ideas. (transcript, p. 117)

Other participants at the conference disagreed with the idea that a college education is a prerequisite for becoming a good reporter. Ray Murdock,[23] project director of a vocational training program in broadcast communications for Native Americans and other minorities in Minnesota, said that he had never attended a school of journalism, yet he had held such positions as news director at two radio stations and anchorman at a television station and was currently a newspaper editor. (transcript, p. 118)

Several media representatives contended that he was the exception rather than the rule (transcript, p. 118), but Mr. Murdock emphasized his belief that he was not an exception, saying, "I don't believe that I'm an exception necessarily, simply because I have had some opportunities that other Indian people have not had." (transcript, p. 118) Mr. Murdock said that it was the responsibility of people in the hiring role at local newspapers in Montana to take a chance on Indian people. He suggested that newspaper employers should not only hire Native Americans but should also initiate their own training programs. (transcript, p. 157)

While minorities are employed as machinists, press operators, and in clerical positions at major newspapers in the State, the opportunities available for on-the-job training or internships in news reporting are very limited. (transcript, p. 106) Robert Lathrop, executive editor of the Great Falls Tribune said that his newspaper takes one or two students from the University of Montana each summer for an internship experience, but that no other internship programs are available on an on-going basis.[24] A Billings Gazette representative said that his paper has two trainee positions

in the newsroom, both of which are held by women.[25] On-the-job training positions exist at other major newspapers in the State in advertising, sales, semiskilled, or blue collar positions.

Recruiting

Statistical information received at the media conference indicates that Montana's major dailies and news service have little if any representation by minorities on their news reporting or editorial staff. (transcript, pp. 90, 93, 95, 107) Since minorities continue to be underrepresented in the University of Montana's School of Journalism and do not participate in the few available training programs of the newspapers, the opportunity for them to occupy decisionmaking positions in any capacity with the press may not be realized. One conference participant said, "In a State where there are roughly 30,000 Native Americans living...there are going to be news events which occur...and I challenge not only that panel but all the Indian people and non-Indian people in the State to say when is that problem going to be rectified? When are Indian people going to be employed by the media?"[26] (transcript, p. 128)

Because minority members qualified to work as newspaper reporters or editorial writers may live outside an employer's business location, members of the Advisory Committee also posed questions about recruiting efforts to several media representatives. Larry Siegel of the Billings Gazette responded:

> When we do have openings, particularly local openings where we can recruit from the population, we do work with the Montana State Employment Service; and the Montana State Service has helped us, in fact, in recruiting Indians....We work also with the Bureau of Indian Affairs. (transcript, p. 94)

Yet statistics presented to the Montana Advisory Committee indicate that only three Native Americans, one a women, are employed at the paper and all are in semiskilled or blue collar positions.

Ed Coyle of the Missoulian suggested that for some positions the paper has recruited by word-of-mouth.

> For the last three years we have been trying to line up someone, an Indian American, to at least write a column for us, and we have contacted different people who we thought were qualified...but so far we have not been able to come up with anybody. (transcript, p. 99)

Pam Swiger of the Montana Standard said, "We very seldom recruit anybody. The news media is overflooded with applications now. It's pretty much up to the people to come. Just like it's...up to the white people to come in and apply for a job too." (transcript, p. 91)

Recruiting efforts on a national basis -- through minority colleges or various national minority organizations such as the American Indian Press Association -- have not been used by local newspapers to end the underutilization of minorities in their work force. "Word-of-mouth" or "walk-in" recruiting such as suggested by Mr. Coyle and Ms. Swiger have been ineffective. According to several Federal court decisions, these methods tend to perpetuate the same composition of the employer's current work force; further, where minorities and females are not well represented at any level, reliance on such recruitment procedures has been ruled a discriminatory practice prohibited by Title VII.[27]

Women's Issues

Although much of the discussion at the Advisory Committee's media conference centered around the absence of minorities in the media, participants also raised a number of issues peculiar to women. As noted earlier, at the five major Montana dailies, the positions of city editor, executive editor, or managing editor are held exclusively by men. Similarly, there are no women correspondents at the various State bureaus in Helena which cover the legislature and State government. Sue Bartlett, director of the Montana Women's Bureau, commented that the lack of women covering news for major dailies at the State bureaus has meant little or no news coverage of the Women's Bureau, the Equal Employment Opportunity Bureau, or the Human Rights Bureau.[28]

Another area lacking women in Montana newspapers is sports reporting. Ed Coyle of the Missoulian said "About two years ago we had a girl who was doing rewrites for us and helping the city editor and a job opened up in sports, assistant sports editor; and we offered her the job; but she declined the position." Mr. Coyle added that with the

proliferation of women's sports he could see that before too long, "We will have a woman covering sports." Although Mr. Coyle suggested that a woman sports reporter is an eventuality, he said he believes that a woman sports writer position will be created only when women's sports become as popular as men's sports. (transcript, p. 97)

Job titles and job responsibilities are other areas of particular significance to women. For example, all the major dailies have a women's section, which is the primary responsibility of the "women's editor."[29] Although all other editor positions, usually held by men, are allocated a staff of three or more and supervisory responsibilities, the women's editor position at all the major Montana dailies has a staff of one woman with no supervisory responsibility.[30] Betty Ann Raymond, women's editor for the Montana Standard, said, "I'm given quite a bit of responsibility...and some authority. That word, I use rather loosely because I have no staff. I have asked for a staff of one." (transcript, p. 179) The same is true with Evelyn King, women's editor of The Missoulian, and Cheri Magnuson, women's editor of the Great Falls Tribune.

Similar to the term "women's editor," the job title "copy reader" does not accurately describe the duties of the individual. At the Great Falls Tribune Barbara Mittal's title is copy reader, yet her supervisor commented that:

> The responsibility goes deeper than copy reading in many instances in our office. It [the copy reader job] determines the place stories will get, how big the headline will be, and also, of course, in subjects that come under that jurisdiction, what the headline is going to say. (transcript, p. 85)

This statement indicates that in this case, job responsibilities go far beyond the scope of the job title, salary, and status.

Affirmative Action

The legal necessity for positive affirmative action to eliminate discriminatory practices has been firmly established by the courts.[31] While all the major dailies in Montana expressed an interest in affirmative action, none had an adequate affirmative action program. The Great Falls Tribune had no written plan of any type. The Billings

Gazette submitted the affirmative action plan of Lee Enterprises, Inc. to the Advisory Committee. This plan expresses neutral "nondiscriminatory" and "merit hiring" practices, but lacks goals or timetables regarding hiring, training, or recruiting of minorities and women. Larry Siegel explained:

> [the plan] is a corporate policy...specific goals and objectives are left to each of our operating units to determine based on their experience and their population situation. (transcript, p. 93)

Information received from other Lee newspaper representatives in the State, however, indicates that affirmative action efforts have not gone beyond those specified in the corporate policy. None of the papers have set goals or timetables. Long-range goals and timetables are essential parts of any affirmative action plan, for without them specific numerical targets for hiring, training, transferring, and promoting cannot be set. Equally important is the fact that an affirmative action plan without specific goals and timetables for correcting underutilization of minorities and women provides little or no opportunity for measuring improvements in equal employment policies.

Although EECC does not require newspapers to implement affirmative action plans, unless required by courts, it contends "that it makes good business sense to identify and revise employment practices which [may] have discriminatory effects...."[33] In addition, EEOC states that such programs "can also help...cut costs and increase productivity through tapping and developing seriously underutilized (and possibly underemployed) human resources, and reduce employee turnover when jobs and promotions are based on merit."[34]

Television Employment in Montana

Regulation by the Federal Communications Commission

The Federal Communications Commission (FCC), the agency charged with responsibility for the licensing and regulation of broadcast channels in the United States,[35] is committed to the concept that locally-based stations should serve the interest of individual communities and be responsive to the needs of these communities.[36] The FCC also has the authority to enforce equal employment opportunity within the

industry.[37] FCC rules require all commercial and noncommercial television stations to establish equal employment opportunity programs designed to eliminate discrimination.[38] The rules charge stations with developing "positive recruitment, training, job design, and other measures in order to insure genuine equality of opportunity to participate fully in all organizational units, occupations, and levels of responsibility in the station." FCC suggests, for example, that broadcasters "might consider the adoption of special training programs for qualifiable minority group members and cooperative action with other organizations to improve employment opportunities and community conditions that affect employability."[39] [emphasis added]

Stations are required to report regularly to the FCC on their progress in implementing these rules. A statistical report must be submitted annually on station employment of "blacks, Orientals, Native Americans, Spanish-surnamed Americans, and women."

The form which the FCC provides to stations is similar to the EEO-1 form used by EEOC to collect data on the race, ethnicity, and sex of employees of private and public entities throughout the United States.[40] The stations are asked to provide statistics in the job categories of "officials and managers, professionals, technicians, sales workers, office and clerical, craftsmen, operative, laborers, and service workers." As Eileen Siedman, deputy director of the Mid-Atlantic Regional Office, U.S. Commission on Civil Rights, stated at the conference:

> We seriously challenge the FCC's statistics because they are collected on forms which are irrelevant to the broadcasting media....There is no way for a station manager, without a great deal of interpretation, to transfer the actual titles and roles and positions of the employees on the station's staff to the EEOC form and provide an accurate, correct portrayal of the positions and the roles that people play. There have been accusations not only that it is difficult to do even if you are well intentioned, but that, in fact, in order to look good and not be investigated, there has been a lot of hanky-panky on the part of many stations who call lower-level clerical staff administrators and managers because it looks better in producing numbers of women and minorities. (transcript, p. 26)

In response to Ms. Siedman's criticism of the FCC reporting form, Lionel Monagas, chief of the FCC General Counsel's industry equal employment opportunity unit, said of the data provided by stations, "We wonder about the meaning behind those statistics, too, because of the inadequacy of the form." (transcript, p. 29)

At license renewal time, broadcasters must report on specific activities they have undertaken to carry out their equal employment opportunity program. Licenses to operate radio and television stations are granted by the FCC for 3-year periods.[41] At the end of each license term, the FCC is obligated to make a determination whether renewal for 3 more years will serve the public interest. A station's license renewal application, in addition to the equal employment opportunity programs, must also include details of past programming and future programming plans with regard to meeting community needs.[42] Such information must be made available for public inspection along with other material including complaints from the public and an analysis of community needs. Mr. Monagas, the FCC representative, told the Montana Advisory Committee that 6 months prior to the filing of application for renewal of TV licenses, the licensee is required to go into the community served and analyze the total demography of the community. A cross section of community leaders must be interviewed as well as a representative sampling of the public to determine the public needs and interests. (transcript, pp. 41-42)

If a broadcaster fails to meet Federal standards for serving the public interest, the FCC has the power and the obligation to seek compliance. The most common FCC action against a station is to order the violator to comply with the FCC decision or rule and set a date for compliance. The FCC may take several actions to insure compliance, including denying a broadcaster's application for license renewal, revoking an existing license, granting a short-term renewal to determine whether a broadcaster will correct existing violations, assessing a fine for violations, or initiating a court action to force violators to "cease and desist" offensive practices. Continuing violation in the face of a court order could result in a broadcaster's being jailed.[43]

There appears to be a gap between FCC policy and practice, however. Mr. Monagas admitted at the conference that, "the Commission record certainly is not good in the area of having denied licenses in relationship to charges of

discrimination." (transcript, p. 40) The FCC has, however, denied licenses on the basis of discrimination as a result of court decisions. In the 1960's in Jackson, Miss., for example, television station WLBT was charged with discrimination against the black population both in programming and employment opportunity and was eventually denied license renewal by the FCC. Gregory MacDonald, assistant journalism professor at the University of Montana, read a portion of the Court of Appeals' ruling regarding WLBT, which he felt summed up the role of community action in relation to the media:

> It is the public (in individual) communities throughout the length and breadth of our country who must bear...final responsibility for the quality and adequacy of television service -whether it be originated by local stations or by national networks. Under our system, the interests of the public are dominant. The commercial needs of licensed broadcasters and advertisers must be integrated into those...of the public. Hence, individual citizens and the communities they compose owe a duty to themselves and their peers to take an active interest in the scope and quality of the television service which stations and networks provide and which, undoubtedly, has a vast impact on their lives and the lives of their children. Nor need the public feel that in taking a hand in broadcasting they are unduly interfering with the private business affairs of others. On the contrary, their interest in television programming is direct and their responsibilities important. They are the owners of the channels of television--indeed of all broadcasting.** (transcript, pp. 223-224)

In another instance, the FCC denied the license application for the Alabama Educational Television Commission based on similar charges of discrimination. (transcript, p. 20)

Participants in the conference workshop on community organization and its impact on broadcasting expressed concern about the costs of filing complaints against the broadcasting industry. They also discussed the feeling of powerlessness among citizens who believe that there is no way to make the stations more responsive. (transcript, pp. 227, 228) Messrs. Monagas, and MacDonald stressed that the

public does have rights in this regard.[45] Mr. MacDonald said:

> If I go down or you go down [to a TV station], there is very little we can do. We can write letters to the editor, and they come out as a letter to the editor; but if a group of people, you know, a dozen people who are pretty well organized, who will go down and say, 'Listen, we would like to sit down with you and talk. Let's get a dialogue started.' I don't think you will find anyone who will say, 'No, we don't want to talk to you,' but no one does that, and the stations won't. Unless they are really pressured, the stations aren't going to go out and try to round up the community support. They are going to have to eventually. The community ascertainment studies will force them to do that, to meet with responsible citizens' groups and members of the public before renewal of station licenses. (transcript, pp. 237-238)

In a subsequent response to Mr. MacDonald's statements, Joseph Sample, president of Montana Television Network, said that the fairness doctrine requires dialogue on issues whether the complainant is one person or a thousand. Mr. Sample said that any station manager who doesn't think he needs community support will not last long.[46]

To the Advisory Committee's knowledge, no groups of minorities or women in Montana have attempted to initiate such a dialogue. However, groups in other States have become increasingly active in this area.[47]

Employment Data

For the past 4 years the FCC has collected annual employment data from television stations in every State.[48] The United Church of Christ has prepared a statistical analysis of reports filed by over 600 commercial stations which shows that 12 percent of the 41,000 full-time workers in 1974 were minority group members. In 1971, the first year of reporting, the proportion of minority employees was 8 percent; in 1973, 11 percent. Similarly, the proportion of women employed full-time at commercial stations has increased slowly from 22 percent in 1971 to 23 percent in 1973, to 24 percent in 1974.[49]

Thus, some positive changes have taken place on a national scale, but these changes are not taking place at all stations. Of Montana TV stations, six have no minority members on their full-time staff. The 1974 review indicates that local television stations in the State have no minorities occupying on-camera positions, including news commentators and talk show and public affairs program moderators. Statistics also show that few minorities occupy decisionmaking positions in official or manager categories at any of the TV stations in Montana.

The positions of camera operator, technician, director, or TV producer are also rarely held by minorities.[50] Mr. Sample pointed out that their production director is a Native American.[51]

An examination of the commercial stations also reveals that there are only two female television news reporters. The position of news director (news anchorperson) is held by approximately 10 men in the State, while women are not represented in this capacity at any TV station. Similarly, there are no female vice presidents or general managers of Montana TV stations, and only two women hold positions as talk show moderators, compared with seven males in these positions.[52]

Television stations KTVQ in Billings, KRTV in Great Falls, and KXLF in Butte are operated by Garryowen Corporation and the Montana Television Network. The employment statistics of these three stations indicate that they employ three times as many men as women. Women are concentrated primarily in clerical positions, and minorities, both men and women, are underutilized. Although both station KRTV and KXLF have "pioneered" in employing women as news reporters, news anchorperson and news director positions are held by men at all three stations.

According to information submitted in its 1974 annual employment report, KTVQ employs 22 full-time staff. Of this number, 17 are males and 5 are females. Three females hold clerical positions, one female holds a professional position and one female is a salesworker. The station employs one Native American male in a managerial position. No minority women are employed in any capacity.[53] The KTVQ news department consists of two full-time employees and several part-time employees from other company departments. The news department has no female or minority reporters on its

staff.[54] The following chart shows the work force by minority status and sex.

KTVQ

Occupation	Total	White		Minority	
		Men	Women	Men	Women
Professional	3	2	1	0	0
Officials & Managers	5	4	0	1	0
Technicians	9	9	0	0	0
Sales Worker	2	1	1	0	0
Office & Clerical	3	0	3	0	0
Craftsman	0	0	0	0	0
Operatives	0	0	0	0	0
Laborers	0	0	0	0	0
Unskilled	0	0	0	0	0
Total	22	16	5	1	0

*Native American

KRTV employs 20 people on full-time basis. Of these employees, 16 are white males and 4 are white females. Of the female employees, 3 are in office and clerical positions, and 1 is in the professional category, as the producer and moderator of a daily half-hour talk show which is telecast statewide. The news department consists of 3 news reporters, one of whom is a woman. In 1973, KRTV was the first TV station to employ a woman as a news reporter. The station employs no minorities. The following chart is a breakdown of their employees by minority group and sex.

KRTV

Occupation	Total	White		Minority	
		Men	Women	Men	Women
Professional	2	1	1	0	0
Officials & Managers	5	5	0	0	0
Technicians	8	8	0	0	0
Sales Worker	2	2	0	0	0
Office & Clerical	3	0	3	0	0
Craftsman	0	0	0	0	0
Operatives	0	0	0	0	0
Laborers	0	0	0	0	0
Unskilled	0	0	0	0	0
Total	20	16	4	0	0

Clifford Ewing, KRTV station manager, commented that, in general:

> Employment opportunities at stations in Montana are not adequate for minorities, women, white male Caucasians, or graduates of our State universities. We have a very low turnover rate...the stations in Montana are small market stations and are not expanding. (transcript, p. 269)

Mr. Ewing said that more than one-third of his employees at KRTV are engineers, a position which requires specialized training and a first class operator's license. "There are almost no female engineers...." he said, "this is a field that the ladies just have no apparent interest in." (transcript, p. 269) Employment information received from

KRTV, however, indicates that nontechnical positions such as managers or sales workers are also without women.

Minority and women conference participants expressed a common concern that Montana TV stations' recruiting efforts are not adequate. However, Mr. Sample, agreeing with Mr. Ewing, said he believes that their recruiting efforts have been adequate, pointing out that they use the Manpower Training Act and scholarship and apprentice programs for journalism students.[55]

Station KXLF, Butte, employs 20 people, of whom 15 are men and 5 are women. Of the female employees, 3, including 1 Asian American woman, hold office and clerical positions; 1 is in a professional position; and 1 is in a managerial position, a production director. Of the men, 1 is a Native American male, employed as a technician. The news department consists of a news director and 2 reporters, 1 of whom is female. The following chart shows the KXLF work force by minority group and sex.

KXLF

Occupation	Total	White		Minority	
		Men	Women	Men	Women
Professional	2	1	1	0	0
Officials & Managers	5	4	1	0	0
Technicians	9	8	0	1*	0
Sales Worker	0	0	0	0	0
Office and Clerical	4	1	2	0	1**
Craftsman	0	0	0	0	0
Operatives	0	0	0	0	0
Laborers	0	0	0	0	0
Unskilled	0	0	0	0	0
Total	20	14	4	1	1

*Native American
**Asian American

Station KFBB-TV in Great Falls is operated by Harriscope Broadcasting Corporation. Donald E. McClintock, vice president and general manager of KFBB, said with regard to employment opportunities, "Without question adequate employment opportunities exist at KFBB-TV for minorities and for women."[56] Employment statistics from KFBB, however, indicate the same pattern of underutilization of minorities and women which prevails at other TV stations in the State. Of 27 employees, only 4 are women and none is minority. One of the 6 managerial positions is held by a woman. All professional positions are held by men, including the 5 news staff jobs. The rest of the female employees are in clerical positions. The following chart shows the KFBB work force by minority group and sex.

KFBB

Occupation	Total	White		Minority	
		Men	Women	Men	Women
Professional	7	7	1	0	0
Officials & Managers	6	5	0	0	0
Technicians	7	6	1	0	0
Sales Worker	4	4	0	0	0
Office & Clerical	2	0	2	0	0
Craftsman	0	0	0	0	0
Operatives	0	0	0	0	0
Laborers	0	0	0	0	0
Unskilled	1	1	0	0	0
Total	27	23	4	0	0

Affirmative Action

The FCC requires that each television station establish, maintain, and carry out a positive continuing program designed to assure equal opportunity in every aspect of station employment policy and practice.[57] As mentioned above, these equal employment opportunity programs must be kept on file at every television station for public viewing.

The Montana Advisory Committee reviewed the 1974 programs of the major television stations in Montana. Several of these had been approved by the FCC. The program developed by KFBB was initially questioned by the FCC. On March 4, 1974, the FCC wrote the station:

> In response to Section VI you state that in view of the insignificant number of minority group representatives residing in your service area a formal program with

regard to the employment of minority groups is not warranted. However, your program does not address itself to specific practices to assure equal opportunity in employment for women.[58]

License renewal information supplied by KFBB provided population statistics only on "White, Negro, and Other," to justify the lack of affirmative action by the station regarding those groups. The station supplied no statistical information or reports of affirmative action efforts with regard to women. The Great Falls work force includes over 9,110 women (37.7 percent of the total work force). Yet the station employs only 4 women out of 27 employees (14.8 percent).

Since receipt of the FCC's communication, the station has amended its EEO program to include women. However, the inquiry has done little so far to change the composition of the station's work force. Lionel Monagas of the FCC commented to conference participants that "one of the weaknesses right now, I think, in the rules is that there is no demonstration of affirmative action on the part of a licensee, no requirement to demonstrate, to show, to prove. He just may make a statement that he has an affirmative action plan. That is quite sufficient for the Commission at the moment." Mr. Monagas added that the General Counsel's office would recommend to the Commission a new set of guidelines concerning affirmative action. (transcript, pp. 37, 38)

Recruiting

With respect to recruitment, Clifford Ewing of KRTV, Great Falls, said, "I'm on record with every State employment office in the State of Montana...when we have an opening, we say 'send me your minorities first.' We do that because the Federal Government tells us to do it." "However," Mr. Ewing added, "if I have two people apply for a job and one is black and one is white, and the white has experience and the black does not, I think any employer would say I have got to go with the experience." (transcript, pp. 270, 271) Although FCC regulations stress equal opportunity for minorities, they in no way infer that an employer must hire a minority person who is not capable of doing the job. This is the reason why the FCC has suggested that broadcasters adopt special training programs for qualifiable minority group members.

In addition to contacting the State Employment Service, most stations place notices in the newspaper and other media which have significant circulation in minority group areas. Notices are also sent to schools and colleges within the State which have a significant number of minority group persons and women enrolled.[59] Ray Brown, director of the Montana Human Rights Commission, suggested that media representatives contact the Native American Studies Department at the University of Montana because they had two 1975 graduates in media and television. (transcript, p. 149)

Because most stations in the State are small, recruiting efforts have been confined to Montana. Notices of job vacancies or recruiting personnel are not sent to employment agencies in other States where trained minorities and women may be living, working, or attending school. Most out-of-State recruiting is done on a limited basis through affiliate stations where company employees may take the option of transferring to another station.[60]

Training Programs

Television stations KTVQ, KRTV, and KXLF of the Montana Television Network have had summer apprentice training programs for a number of years. In addition, they award scholarships at both the University of Montana and Montana State University. Mr. Sample, president of the network, said:

> We have had two trainees under the Manpower Training Act. We have participated in the Columbia School of Journalism minority news program. Each year we present a field training program for students at the School of Journalism at the University of Montana.[61]

Mr. Ewing of KRTV said that each summer his station hires a news intern from the University of Montana School of Journalism. "In addition, "he said, "there is a part-time camera production position that we have at all our stations, and this generally is a high school senior who feels he has an interest in television." (transcript, p. 300)

At station KXLF, Butte, a woman is being trained to be an engineer. Mr. Sample said:

> Our apprentice and scholarship programs have produced a limited number of good staff members....We have two good department heads who are graduates of our training program. It has probably been worthwhile for the stations....Many of our trainees who have gone on to larger markets found the experience of great value.

Regarding minority trainees, however, Mr. Sample commented, "An Indian we trained at KXLF 2 years ago had to be fired for consistently reporting late for work." Mr. Sample also said, "...two Indians we sent to the Columbia School of Journalism (minority journalism program) never attended a single class."[62]

Information received from KXLF, KRTV, and KTVQ suggests that training in a small organization such as a television station is difficult. One or two trainees are all that a station can handle at one time because of limitations of staff and money.

Station KFBB, Great Falls, has an internal internship program for station staff, a regular internship program through the University of Montana, and an internship program through a local employment service. Ken Dunham, news director at KFBB, told conference participants, "In the 5 1/2 years that I have been at KFBB, we have not had one Indian person trainee stay at that station more than 7 months. Every one of those people have left under less than honorable circumstances." He also asked, "Frankly, how do we get Indians to work on time?" The question of responsible minority trainees was repeated several times during the workshops and panel discussions. (transcript, pp. 155, 161, 272)

Many of the minority participants at the conference objected to the implication that all Native Americans are late for work or would abuse trainee positions. One Native American, alluding to interviews he had had with employers in private industry, said, "I really wonder if you want Indian employees. At every job interview, I have been cautioned as to what would happen to me if I was tardy, missed work because of drunkeness, all of these things that Indians supposedly do." (transcript, p. 305) Ray Murdock, director of a training program in Duluth, Minn., contended:

> There are Indians who go to work on time. When I have to go on the air at 6:00 in the morning and do a

newscast, I have got to be there on time. I have got to write the news, I have got to have all of those skills involved with it, but I didn't learn those the first day that I went on the job. (transcript, p. 158)

Mr. Murdock suggested that station managers and news directors be willing to accept responsibility for the trainee, and to pass along some of the skills that they have:

> When you talk about bringing someone new into your station who does not necessarily have all of the time skills...grammatical skills...and all of that...you have got to meet that person half way and not simply sit back and say 'we tried.' (transcript, p. 162)

He emphasized, "As long as your station carries an FCC license, then you have to be willing to work in that context." (transcript, p. 162)

Wayne Killmer, station manager of KGVO-TV in Missoula, said part of his frustration had been that "we have to obviously be involved in the training programs...at what level do we have to become involved to even get people that are interested in continuing into a program that would qualify them to begin on an apprenticeship level...." (transcript, p. 155)

Mr. Murdock responded, "At the very beginning level...establish contact with urban organizations within your own city. Call them and say, 'Listen, I have some ideas about training programs for minority people. Will you come and talk to me about it?" He contended that it was a long process, but that it could be done. One member of the Advisory Committee offered media representatives the names of organizations to contact if they were sincerely interested in training programs. Some media representatives said that this might be a good starting point, but others indicated that they were apprehensive because of experiences with Native Americans at their stations. (transcript, pp. 157, 160, 169)

Notes to Chapter III

1. 42 U.S.C. § 2000e.

2. U.S., Equal Employment Opportunity Commission, Affirmative Action and Equal Employment: A Guidebook for Employers, vol. 1, January 1974 (hereafter cited as Guidebook for Employers).

3. U.S., Commission on Civil Rights, The Federal Civil Rights Enforcement Effort, To Eliminate Employment Discrimination, July, 1975, vol. V, p. 470.

4. U.S., Dept. of Commerce, Bureau of Census, General Social and Economic Characteristics, United States Summary, 1970 Census, Series PC(1)-C1, Tables 94 and 84, and U.S. Dept. of Commerce, Bureau of Census, American Indians, Subject Report, 1970 Census, Series PC(2)-1F, table 9.

5. Guidebook for Employers.

6. 401 U.S. 424 (1971).

7. Revised Code of Montana (R.C.M.), Section 104-301 et seq.

8. U.S., Department of Commerce, Bureau of the Census, Detailed Characteristics, Montana, 1970 Census of Population and Housing, PC (1)-D28, table 139.

9. U.S., Department of Commerce, Bureau of the Census, Subject Report, American Indians, 1970 Census of Population and Housing, PC(2)-1F, table 6. See also Detailed Characteristics, table 164.

10. Ibid.

11. Employment data provided by Larry Siegel, general manager, Billings Gazette, Mar. 26, 1975.

12. Ibid.

13. U.S., Department of Labor, Manpower Administration, Data Systems and Reports, Manpower Profile: Billings, June 10, 1972, p. 51.

14. U.S., Department of Labor, Manpower Administration, Manpower Profile: Missoula, Sept. 26, 1972, p. 1.

15. State of Montana, State Employment Service, Manpower Information for Affirmative Action Programs, 1974-1975, pp. 5-7 (hereafter cited as Manpower Information.)

16. Robert Lathrop, executive editor, Great Falls Tribune, interview in Great Falls, Mar. 7, 1975.

17. Manpower Information, pp. 5-7.

18. Data was not available by sex.

19. The Spokeswoman, vol. 7, no. 5, November 1974, p. 3.

20. 401 U.S. 424 (1971).

21. U.S. v. Bethlehem Steel Corp. 446 F. 2d 652 (2nd Cir 1971); Papermakers and Paperworkers Local 189 v. U.S., 416 F. 2d 980 (5th Cir 1969); Albemarle Paper Co. v. Moody, 422 U.S. 405, 43 U.S.L.W. 4880 (1975).

22. U.S., Equal Employment Opportunity Commission, Affirmative Action and Equal Employment: A Guidebook for Employers, vol. I, p. 7.

23. Ray Murdock was the moderator of the conference workshop, "Training Programs and Minorities."

24. Robert Lathrop, executive editor, Great Falls Tribune, interview in Great Falls, March 1975.

25. Larry Siegel, general manager, Billings Gazette, interview in Billings, March 1975.

26. This question was directed by Ray Murdock to panel of representatives from the Montana Standard, Billings Gazette, Missoulian, Independent Record, Great Falls Tribune, and the Associated Press.

27. Bowe v. Colgate Palmolive, 416 F. 2d 711 (7th Cir. 1969); Jenkins v. United Gas Co., 400 F. 2d 28 (5th Cir. 1968); Blue Bell Boots v. EEOC, 418 F. 2d 355 (6th Cir. 1969).

28. Sue Bartlett, director, Montana Women's Bureau, interview in Helena, February 1975.

29. The Billings Gazette calls its section "Family."

30. Employment information obtained from the Montana Standard, the Great Falls Tribune, and The Missoulian, March 1975.

31. U.S., Equal Employment Opportunity Commission, Affirmative Action and Equal Employment: A Guidebook for Employers, vol. 1, January 1974.

32. The Missoulian, Montana Standard, and Independent Record.

33. U.S., Equal Employment Opportunity Commission, Affirmative Action and Equal Employment , vol. I, pp. 11-12.

34. Ibid.

35. The FCC licenses individual stations rather than networks.

36. Marsha O'Bannon Prowitt, Guide to Citizen Action in Radio and Television, United Church of Christ, Office of Communication, (New York, 1971).

37. For a detailed discussion of the civil rights responsibilities of the FCC, see U.S., Commission on Civil Rights, The Federal Civil Rights Enforcement Effort-1974, vol. 1, To Regulate in the Public Interest, November 1974, chap. 1.

38. Stations with fewer than five employees are exempt. See Appendix A for a copy of the FCC Equal Employment Opportunity Program (License renewal application, Sec. VI).

39. Prowitt, Guide to Citizen Action in Radio and Television, p. 5.

40. The FCC equal employment data reporting form is included in appendix A.

41. In Montana, all station licenses are up for renewal on April 1, 1977.

42. Relevant portions of the FCC application for broadcast license renewal (Sec. IV B) are included in appendix C.

43. Prowitt, Guide to Citizen Action in Radio and T.V., p. 5.

44. Office of Communications of United Church of Christ v. F.C.C., 359 F.2d 994, 1003(1966), emphasis added by Circuit Judge Burger.

45. Lionel Monagas and Gregory MacDonald moderated a conference workshop, "Community Organization: Its Effects on Newspapers and Television."

46. Mr. Sample responded by letter in February 1975 to MSRO questions prior to the April 1975 conference. In addition, Mr. Sample reviewed the first draft of this report and responded in writing in December 1975. (hereafter cited as Sample letter, February or December).

47. Prowitt, Guide to Citizens Action in Radio and T.V.

48. All employment data cited for individual stations has been taken from Annual Employment Reports, 1974, submitted by stations to the FCC in Washington, D.C.

49. United Church of Christ, Office of Communication, Television Station Employment Practices: The Status of Minorities and Women (Wash. D.C., 1974). Data was not provided for minority women as a separate category.

50. Ibid.

51. Sample letter, December, p. 4.

52. Ibid.

53. In late April 1975, one minority woman was hired.

54. In September 1975, a Native American male was hired as a news reporter.

55. Sample letter, December, p. 5.

56. Donald E. McClintock, general manager, KFBB-TV, Great Falls, letter to Norma Jones, Mountain States Regional Office, U.S. Commission on Civil Rights, Jan. 28, 1975.

57. FCC License Renewal application form, Sec. VI, Equal Employment Opportunity Program. (See Appendix B.)

58. Joseph F. Zias, FCC. letter to Donald E. McClintock, general manager, KFBB-TV, Great Falls, Mar. 4, 1974.

59. Information from Equal Employment Opportunity Programs submitted by stations to FCC, Washington, D.C.

60. Ibid., also interviews with Montana station managers.

61. Sample letter, February.

62. Ibid.

IV. IMAGERY IN THE MEDIA

Overview

The concept of imagery in the media is a far more complex issue than employment. Images are in the mind's eye and vary from individual to individual. Imagery involves the perceptions, attitudes, and social awareness not only of those who project the image, but also of those who behold it. False or misleading imagery may convey a derogatory misconception of minorities and women. Stereotyped notions about minorities and women may also instill or reinforce in the public mind false beliefs about these various groups.[1] For example, misleading imagery may encourage the belief that all Irish are red-headed and quick-tempered, that all Jews are shrewd and grasping, or that all Japanese are short, buck-toothed, and sly, when this is clearly not true. Nationally produced advertisements and shows as well as local productions contribute to stereotyping of minorities and women.

During the course of its investigation, Commission staff and Advisory Committee members sought the perceptions of minority and nonminority students in Montana regarding the images of minorities and women presented by the media in their State. With the assistance of Gregory S. MacDonald at the University of Montana, and Dr. Alanna Brown, professor of English at Montana State University, a number of student views were gathered.

On the subject of women and minorities as newscasters and reporters, it was noted that although there may be women and minority reporters, there are still no female or minority "anchorpersons" on any of the three national networks. "This situation extends to local television," one student pointed out. "For example, local TV stations have been using women reporters quite a lot, but still have male anchormen."

On the issue of women and minorities as subjects of news, one student commented that "women and minorities get almost no positive reporting. Stories tend to stress conflict or violence." This same theme was touched upon by another student who commented that the coverage of women in

the news still emphasized those women "who have broken into a man's world successfully....As it is now, there is no news value in what a woman does unless she replaces a man."[2]

A student from Helena wrote:

> Local news in the State of Montana has no women commentators and I have yet to see a female reporter on TV from a Montana news department. As for the treatment of minorities such as Indians in Montana media, there is little to say because they are rarely brought up. Once in a while a small paragraph hidden in the inside pages or blazing headline about an uprising--in some other State.[3]

Students had the following comments regarding the image of Native Americans:[4]

> The Indian image depicted in the local papers in my opinion is very biased. First, any incidents involving Indians which typify the stereotype image such as lazy, drunk, disorderly, generally are newspaper items.
>
> I cannot recall ever seeing an Indian news broadcaster in Montana -- nor a black one for that matter--the typical Indian, from the little I have been exposed to is fat, dirty, and usually drunk.
>
> Good Indians are those protrayed as 'white' Indians; bad Indians are all alcoholic. The paper emphasized the 'white' aspects of Indian culture, not Indian heritage.

Regarding women, students offered these views:[5]

> Montana papers...tend to focus on women as the homebody. Pages are devoted to the woman as mother or wife, recipes, helpful hints, etc. I feel that not enough space or attention is given to the other aspects of a woman.
>
> In our local newspaper, columns relating to women's achievements are rarely shown, other than in the 'Woman's Section,' depicting stereotyped female functions of supposed interest such as guilds, culinary feats, etc.

> The woman is ornamental in our news media; she holds no powerful status.

Minorities, Imagery, and Newspapers

The first amendment, "Congress shall make no law...abridging the freedom of speech or of the press...," gives newspapers wide latitude in controlling news content. At the Montana media conference, the issue of lack of minority reporters was significant for many participants who felt some newspaper content projects misleading images of minorities. They felt that these misleading images were directly related to the lack of minorities on newspaper staff. Mike Voeller of the Independent Record in Helena commented that the role of a newspaper "...is to mirror the community, to report what's going on and to editorially comment about it." But several conference participants suggested that without minorities employed, the possibility exists that the total community is not being mirrored and that false and misleading images are being projected of minorities by nonminority reporters. As W. J. Brier, Dean of the School of Journalism at the University of Montana, commented at the conference, "I'm a regular reader of three Native American newspapers in Montana and my experience from that readership suggests that the Native American story is not being told well by the professional Montana media." (transcript, pp. 103, 116, 259)

Participants at the media conference discussed possible stereotyped and one-sided images projected by Montana press about minorities. Patricia Scott from the Rocky Boy Reservation read to the Advisory Committee an article from the Great Falls Tribune (April 2, 1974) entitled "Chronic Cases Give ADC Bad Name," which was written about landless Indians. Ms. Scott quoted the article:

> We can't stop the girl 14 or 15 from going out with boyfriends. Soon she's pregnant. She won't give up the child when it's born. She takes it home to Mama. About all we can do is teach them birth control....There is no law that requires abortions or allows us to take babies from them. (transcript p. 218)

This article also concerned a Tribune reader, who wrote to William James, editor of the Great Falls Tribune:

> The publication of this article provided the readers with a classic example of insensitivity, discrimination, opinionated materials. The city of Great Falls, especially the news media, gives the landless Indians a bad name when you print such articles...where Indian news is concerned, the policy of the Tribune appears to be 'put the bad news on the front and good news on the back.'[6]

The conference discussions which took place among minorities and members of the news media suggest that minorities are unhappy with the images projected of them and are concerned about news content, placement of news, objectivity, and the lack of minority reporters. One participant said that as a newspaperman and an Indian, he totally rejected the idea that any non-Indian reporters on newspaper staff could cover news in the Indian communities, reservation or urban as well as an Indian reporter. Jackie Trochee, another conference participant, raised the point that "many news reporters...aren't objective simply because they are not educated or sensitized to like Indian people...their religion, their humor...I think some effort should be made on behalf of reporters and other people involved in the media to correct that problem." (transcript, pp. 116, 210, 216)

The media conference brought out a balance of opinions among newspaper representatives who recognized a need for minority reporters and those who did not believe that the lack of minority reporters detracts from news coverage or objectivity. On the subject of objectivity concerning Native Americans, Pan Swiger of the Montana Standard was asked if she felt the lack of minorities on the staff affected the newspaper in any way. Ms. Swiger said, "No,...I think that we are all very fair and unbiased." (transcript, p. 92) Mike Voeller[7] of the Independent Record said, "I think I know and have as good a viewpoint as if I had an Indian on my staff." Ed Coyle of the Missoulian told the Advisory Committee that lack of Native American reporters had no direct effect on his paper. "We are very aware of the problems; we see them every day...," he said. Carol VanValkenburg of the Missoulian, said she did not believe a person can be totally objective, "As far as being objective, I guess it's mostly telling it as you see it....There is no such thing, perhaps, as telling it like it is, because the way I see it and the way you see it are different...." She added, "I certainly agree that there is a

real need to have...minorities in writing the news...." Robert Lathrop of the Great Falls Tribune said, "We want people to report what the fact is, the record, which is based on investigation as the source upon which decisions are made." (transcript, pp. 91, 104, 204, 106)

Advisory Committee member Geraldine Travis, herself a minority woman, summed up some of the feelings expressed by minority participants:

> My experience with the news media has not always been where you can go and tell the reporter how you feel or what you think, because sometimes when they report the news, they report as they see it; and the way they see it is not always the way a minority will see it or feel....This is why it's terribly important that there is some representation and that people who relate to the opinions and problems of minorities are represented...there is a difference in sympathy and really understanding. (transcript, p. 205)

Women, Imagery, and Newspapers

The image of women projected in newspapers is an issue of nationwide impact and concern. Former presidential press secretary, journalist Bill Moyers has raised these questions:

> Why does the press identify Golda Meir as a grandmother but not Georges Pompidou as a grandfather? Why does the press talk of a female politician's hair coloring and dress style, but not the hair dye or tailor used by a Presidential candidate or senator? The male-dominated press is dutiful about reporting a woman's presence in any group...But how frequently does the press report a woman's absence from a group?[8]

A conference participant made a similar comment about Montana newspapers: "Most women are asked specifically if it's Miss or Mrs. or Ms...women are still described as to their appearance, or their relationship to different people like their husband...rather than just as a person with an independent opinion...." (transcript, p. 112) Ronnene Anderson, a former reporter for the Missoulian, also gave some insight into the issue of press coverage of women when she wrote:

> The press always has reflected the current climate of opinion about women. When society was uninterested in women as equal human beings, the press was uninterested. When society discovered that women wanted to be liberated and laughed, the media laughed too. When society began to take a serious look at the plight of women, the press began to look too. It is still beginning to look.[9]

During the conference workshop, "Media Stereotyping of Women," moderators Rosalyn Kaplan and Louise A. Hale echoed similar concerns.[10] Ms. Kaplan said "The media must be analyzed in terms of our social system, because the mass media are an extension of society--they reflect reality, although as we well know, they also may distort reality."

Participants at the conference raised related questions regarding newspaper coverage of women. John Board, a Montana Advisory Committee member, asked, "Why does there have to be a women's page or a women's editor?" Edward Coyle of the Missoulian responded that "this is mostly in response to the demands from the women." Mr. Coyle said the demands were for "recipes, fashions, and 'Dear Abby'." Betty Ann Raymond, women's editor of the Montana Standard, said that titles were unimportant and she would "just as soon be called the women's editor or people editor or trend editor or emphasis editor." Ms. Raymond was critical of time and energy devoted to trying to change the name from women's news to another title to avoid "the terrible stigma--women." She said, "It doesn't matter how much content you have, or how many news segments have broken in any given day, you have a certain number of pages to be filled, so much white space, and all things, no matter how excellent, cannot possibly be placed on page one." Ms. Raymond expressed the belief that if the content is well done, well written, accurate, and has a good headline, it will be read even if it is on the last page of the newspaper. She quoted Charlotte Curtis of the New York Times as having said, "I think you girls should go back to food and fashions and interior design, because you have just about done us in with incest and lesbianism and abortion and the pill and homosexuality and rape." Ms. Raymond's own view is that, in a valid effort to do away with the "irrelevant stuff" that had been appearing for many decades on the women's pages, women's editors have lost their sense of direction. (transcript, pp. 96, 178, 179, 189)

On the subject of women's pages, Representative Bella Abzug of New York told the First National Conference on Women and Media in May 1975: "What women want is equal recognition in employment [and] to get news affecting women off the women's pages and onto the news pages."[11] One conference participant echoed Rep. Abzug's opinion. Speaking of the Montana media, Alanna Brown from Montana State University said, "What I find is the case if that if women, for instance, take a political stand like the NAACP, what happens is that they are put in the women's section rather that where an equally political stand taken by a man is placed in the Montana coverage section." (transcript, p. 110)

On another area of newspaper content, concerns were raised about photographs of women and objective reporting. One conference participant said:

> I can't get over how horrible women athletes look in the paper. Their eyes are crossed, they're biting their tongues. There are some sort of ridiculous pictures coming out; and then we have Jack Nicklaus, seriously staring at that ball, conquering the world in golf. These seem to me to be very sexist images. (transcript, p. 110)

Judy Smith, of the Women's Resource Center at Montana State University, addressed a similar area of concern: "I would argue that the impact of the newspaper still is to stereotype men and women....It happens to be my firm belief that we learn our images through the media very often, and this is still very biased." Ms. Smith added, "I think the Missoulian still has these kinds of images with women and I would certainly hope that it would be working to avoid and stop stereotyping women and minorities." (transcript, p. 113)

In a related discussion, one conference participant questioned why newspapers in Montana print direct quotes which are biased on either race or sex, when often such quotes have no relationship to the main point of the article. Alanna Brown cited an example of a person opposing the Equal Rights Amendment who was quoted by the paper as saying, "Well, God picks...his apostles." Ms. Brown said, "This is obviously a very eroded and sexist statement."[12] She objected to its being carried by the newspaper. "I

think that papers can have a lot more...educational and provocative merit," she said. (transcript, pp. 111)

Several reporters expressed the belief that news content and imagery was unbiased. (transcript, p. 92) Some newspaper representatives gave the Advisory Committee clippings and editorials indicating their positive stand on the Equal Rights Amendment. Mike Voeller of the Independent Record said:

> I championed passage of the Equal Rights Amendment in 1973 and caught holy hell for a year, from the anti-ERAers. The senate was dragging its feet. I went to one of my women reporters and said, "Write another editorial. I don't care what you say, except the first sentence has to say, color...the senate yellow." (transcript, p. 102)

Television Imagery, Minorities, and Women

Lee Loevinger, former Federal Communications Commissioner, believes that television is a reflection of reality. According to Mr. Loevinger, television should reflect a common cultural image that "...is seen, understood and accepted by all people.... [the] social image reflected in the media...must be one that truly reflects the majority."[13]

In a pluralistic society, an aggregate of many racial, ethnic, and cultural groups, the view that television should reflect the majority is open to criticism since it implies that there may be little chance for people of minority cultures to see themselves reflected in television. There is also a likelihood that when they are reflected, they are portrayed as the dominant majority views them rather than as they view themselves, and these two views may vary greatly. Actually, a true portrayal of the majority, which Mr. Loevinger argues is necessary for a common culture, becomes problematic when one considers that women of all races and ethnicities, in fact, constitute a majority in the Nation as it does in Montana (50.4 percent of the State's population).

In a nationwide survey of public attitudes about television, a random cross section of American viewers expressed a strong desire for changes in programming regarding women and minorities. The survey, developed by the Screen Actors Guild, was sent to newspapers throughout

the country. The responses indicate that the majority of viewers want to see, among other changes, a more positive image of women and a more accurate portrayal of minorities. Of the viewers responding, two thirds said they would like to see women appearing on TV in positions of authority -- for example, as women in professions (86 percent), as spokeswomen for national products (73 percent), as hosts of talk shows (81 percent), and as anchorpersons presenting national news (67 percent). Sixty-nine percent said they do not think the images of women presented on TV are truthful and believable, and 64 percent said that the image of minorities is not accurately represented.[14]

The findings of the survey are relevant to the Montana Advisory Committee study because in the Montana television industry, minorities and women are not represented in positions of authority. For example, approximately seven male talk- show moderators host public affairs programs, but only two women in the State have similar positions. This imbalance, coupled with the fact that there are no women news anchorpersons at any of the commercial stations in the State, suggests the absence or near absence of women with authority images.

The same is true for minorities in on-camera positions in Montana. If the majority's image of minority cultures is created and reinforced significantly from what they see on television and if there are inaccurate images or no images presented, the public's impression of people of minority cultures may be faulty. Such misunderstanding can have far-reaching effects. The 1968 report of the National Advisory Commission on Civil Disorders makes the point strongly when it accuses broadcasters of failing to communicate:

> They have not communicated to the majority of their audience..which is white...a sense of the degradation, misery, and hopelessness of living in the ghetto. They have not communicated to whites a feeling for the difficulties and frustrations of being a Negro in the United States....Equally important,...most television programming ignores the fact that an appreciable part of its audience is black. The world that television offers is almost totally white, in both appearance and attitude....If what the white American...sees on television conditions his expectations of what is ordinary and normal in the larger society, he will neither understand nor accept the black American.[15]

Harriett Skye, president of the American Indian Press Association, said at the Montana media conference, "The television industry has probably done the most to stereotype American Indians from the beginning." She said she believes this is the reason why public affairs programming and local shows moderated by and responsive to Native Americans are crucial to counteract commonly accepted stereotypes. Ms. Skye said that a survey conducted by the Office of Public Information, United Tribes of North Dakota, of the largest television stations in North and South Dakota and Montana showed that of the 586 television employees only 15 were American Indians. The only program of minority broadcasting produced by any station in the survey was from North Dakota. "That's KFYR-TV and that is the show that I do," Ms. Skye said. She stated that the survey suggested that other stations in the tristate area found no time for minority broadcasting. (transcript, pp. 169, 171)

Montana representatives in the media said that their public affairs programs do address minority and women's issued. Clifford Ewing of KRTV said, "We regularly invite American Indians from reservations in our area to come and appear not only on our 'Today in Montana' program, which is telecast statewide, but our regularly scheduled newscasts." Minorities at the conference, however, indicated a desire to see minorities as hosts, moderators, and news personalities on regularly scheduled programming, as well as participants. One conference participant asked, "What strategy should we use to get the television stations to become more responsive to minority programming?" (transcript, p. 234)

The question of programming responsive to minorities and the accurate portrayal of groups by broadcasters is often cited in connection with the "fairness doctrine." Under its mandate, the FCC charges broadcasters with special and continuing responsibility in the presentation of news and public affairs programming. Broadcasters must fulfill two basic requirements. First, they must broadcast discussion of issues of great public concern, and second, they must assure overall fairness in that discussion by giving fair coverage to each substantial viewpoint. Civil rights advocates have argued that issues affecting women and minorities must be covered fairly if they are controversial in nature. Programming which presents stereotyped views of women and minorities may be implicit violations of the fairness doctrine.[16]

Lionel Monagas of the FCC told conference participants that there is an FCC requirement that a licensee do public affairs and public service programming, but it is up to the licensee to make the determination what that programming will be.[17] "Some of this," Mr. Monagas said, "must be based on the ascertainment of community needs and the programming that the community indicates." (transcript, p. 59)

The ascertainment of community needs was established by the FCC in recognition of the fact that there are types and areas of service essential to meet community needs and interests in broadcasting. Broadcasters' programming has always been a primary indicator of their service to the public--and consequently their right to hold a license.[18]

The FCC's basic programming policy statement identifies 14 categories of programming that a station should carry as "the major elements usually necessary to meet the public interest, needs, and desires of the community in which the station is located." "Service to minority groups" is one of the categories. Information received at the media conference from minorities suggesting that current minority programming is not responsive to their needs raises serious questions about the TV stations' fulfillment of "service to minority groups" requirements.[19]

Conference participants were vocal on the question of images portrayed of women as well as minorities. Mary Elizabeth Stewart of KRTV said when she became the first woman TV news reporter in Montana in 1973, she received a "mildly hostile reaction." She said, "I did have a surprising backlash from people who resented my being there because I was a woman, because I was taking a job away from a man, and I couldn't possibly know anything anyway." Ms. Stewart said most of her detractors were women, "I don't know what that says, but I think it probably indicates that the general consciousness of the women in Montana about being a woman and about the women's movement and all those things incumbent to it, is not very high...." (transcript, p. 199)

The conference workshop on media stereotyping of women was well attended and provoked substantial discussion of the impact of television commercials and programming on women. Although the discussion focused on questions applicable to network television nationwide, the issues also affect and are critically relevant to Montana viewers.

Workshop comoderator Rosalyn Kaplan reviewed several studies of the roles given women in commercials and their content in general. She noted that evenings and weekends, when television audiences increase in size and diversity, the great majority of commercials feature men. In commercials women are most frequently shown in the kitchen or the bathroom, and they usually sell cosmetics and household products, whereas men are often shown around machinery and are more likely to be selling drugs or medicine. Women are often portrayed as housewives acting in a subservient manner. Studies note that the housewife role in itself may not be negative; however, it may be negative as portrayed in the media. Women are not often seen in the variety of occupations that men are in advertisements or in the variety of jobs which women hold in the real world. Men are generally in dominant roles and settings, either as individuals or relative to women in the same setting, or portrayed as benefactors of tasks performed by women. For example, men are recipients of the good cup of coffee which a wife makes in a TV commercial.

Ms. Hale, the other workshop moderator, stressed the importance of television programming in projecting images which significantly influence the public. She believes this is because the public identifies with characters and roles in dramas, for example, more than those in commercials.

A 1972 study by the National Capitol Area Chapter of the National Organization for Women,[20] which was aired by WRC-TV in Washington, D.C., found that women in afternoon soap operas are depicted as emotional housewives, mothers, or girlfriends seeking and receiving advice from men. Women were more often mentally ill or emotionally disturbed than men; their own problems, which almost always related to their love lives, mental health, or children, were the major focal points of the storylines.

Ms. Hale and Ms. Kaplan made several recommendations to Montana women seeking change in media images of women. They suggested that women do freelance writing for local journals and newspapers, that women move to file complaints with the Montana Human Rights Commission if they feel they have been subjected to discrimination, that Montana women's organizations maintain talent banks for media jobs, that they establish groups to monitor television programming and press coverage and then confront the stations and

newspapers, and that women make use of rights under the fairness doctrine.

On a national level, women have been vocal about media imagery. The National Organization for Women (NOW) has a broadcast media task force. Among other activities, the task force has put together for local use a "Broadcast Media Kit" outlining strategies "for creating a feminist media." The kit provides directions for gathering employment information from stations and monitoring programs. It also provides material on FCC requirements and the fairness doctrine and a model agreement between NOW and a television station.[21]

Commenting on the amount of coverage given to minorities and women, Mr. Sample said, "While we do not believe that women or minorities have any real concept of the amount of coverage they receive on television, we will attempt to increase it."[22]

Notes to Chapter IV

1. Gerald Astor, Minorities and the Media (Chicago: Ford Foundation, November 1974).

2. Summary of student views by Gregory S. MacDonald, assistant professor, School of Journalism, University of Montana, February 1975.

3. There are no women news reporters at KTCK-TV in Helena. There are two women news reporters in the state, one at KRTV, Great Falls and one at KXLF in Butte.

4. Excerpts of letters from Montana State University students.

5. Ibid.

6. Jessie J. Bishop, Great Falls, Mont., letter to William D. James, editor, Great Falls Tribune, Apr. 3, 1974.

7. Mr. Voeller was born in an Indian hospital and spent the first 18 years of his life on the reservation. According to a letter of response from Lee newspapers, Mr. Voeller feels that he could obtain as much or more information on a news story as an Indian reporter because of the extent of in-fighting and the total lack of cooperation between tribes.

8. Liberating the Media: News, School of Journalism, University of Missouri at Columbia, Freedom of Information Center Report No. 289, September 1972.

9. Ronnene Anderson, "Press Coverage of Women," Montana Journalism Review, no. 17, 1974.

10. Ms. Kaplan is an administrative assistant, Center for Continuing Education, University of Montana. Ms. Hale is an assistant professor, Department of Sociology, Montana State University.

11. Women Today, Today Publications and News Service, vol. V, no. 11, May 26, 1975.

12. Dr. Brown's remarks refer to and paraphrase the article, "Senate axes, buries Equal Rights Amendment," Great Falls Tribune, Feb. 2, 1973, p. 1.

13. Lee Loevinger, "The Ambiguous Mirror - the Reflective Projective Theory of Broadcasting and Mass Communications" (speech delivered at the National Association of Broadcasters Regional Conference, Atlanta, Ga., Oct. 17, 1967), p. 15.

14. "News from the Screen Actors Guild," Oct. 31, 1974.

15. U.S., National Advisory Commission on Civil Disorders (New York: Bantam Books, 1968), p. 383.

16. Retail Store Employees Local 880 v. F.C.C., 436 F. 2d 248 (D.C. Cir. 1970).

17. See appendix C.

18. Prowitt, Guide to Citizen Action in Radio and T.V., p. 8.

19. Ibid.

20. "Women in the Wasteland Fight Back - A Report on the Image of Women Portrayed in TV Programming," 1972.

21. The broadcast media kit may be obtained from the NOW National Office, 5 South Wabash, Suite 1615, Chicago, Ill. 60603.

22. Sample letter, December, p. 7.

V. FINDINGS AND RECOMMENDATIONS

EMPLOYMENT IN THE MONTANA MEDIA

Findings: General

From interviews and information received prior to and during the media conference, the Montana Advisory Committee found that minorities, specifically Native Americans, and women are underemployed and underrepresented in both television and the written news media.

At Montana TV stations, minorities are absent from on-camera positions such as news commentators, moderators, and public affairs hosts.

None of the five major dailies in Montana employ minorities as news reporters or editorial writers. Newspaper representatives told the Montana Advisory Committee that they have been unable to locate qualified minority applicants in the State. At all major newspapers in the State, minorities occupy few decisionmaking positions and are underrepresented in all other job categories. The Advisory Committee also found that women occupy few of the decisionmaking positions in newspapers and television.

The Advisory Committee found that there are no news anchorpersons who are women, and reporting of news concerning both women and minorities is often unbalanced, stereotyped, or not reported.

Recommendation 1

To facilitate the upgrading of skills of Native Americans and to increase greatly the numbers of Native Americans qualified to fill managerial and professional positions at newspapers and television stations in the State, the Bureau of Indian Affairs, U.S. Department of Labor, and the University of Montana should develop and fund training and educational programs addressing the specific employment needs of Native Americans. Such programs should be developed and implemented in cooperation with Montana's TV stations and newspapers. An example of such a training

program is station KKTV's "Involvement" series in Colorado Springs, Colo.[1]

Publishers of the five major dailies should combine their efforts and funds to initiate a training program for minorities. Such a program should be developed and implemented in consultation with the American Indian Press Association (Washington, D.C.) and the Motivation Through Communication organization (Duluth, Minn.), and input from local Native American community organizations.

Similarly, the U.S. Department of Labor and the University of Montana should develop and fund training and education programs addressing the specific needs of women to implement the above recommendation.

Organizations concerned with the quality of newspaper and TV coverage such as the National Association of Broadcasters, Sigma Delta Chi, American Women in Radio and TV, and the Great Falls Newspaper Guild should publicly support the training programs for minorities and women. Training needs of women will differ from minorities; for example, they may be underemployed as opposed to not represented. Training and educational programs should address their group needs and possibly focus on appropriate methods to train clerical women workers to become TV and news reporters.

Newspaper publishers and TV station personnel managers should establish and maintain an "out-of-state" recruitment program in order to identify qualifiable minorities and women who are interested in working in Montana.

Findings: Newspaper Training Programs

The Advisory Committee found that opportunities for ongoing training programs or internships are limited at all major newspapers in the State. Available internships are usually offered, each summer, to students enrolled in the University of Montana's School of Journalism. The recruitment method for available internships limits the availability of training opportunities for minorities and women. To date only two minorities have graduated from the journalism school. Similarly only 37 women have graduated in the past 2 years.

Recommendation 2

Each of the five major dailies in the State should offer ongoing training programs in news reporting and editorial writing. The programs could be developed by assigning the responsibility of working with one or two interns for a 6-month period to current news reporters. The training programs should not be limited to college or university students but also should be offered to qualifiable minorities and women. Recruitment of trainees should be coordinated with major Native American and women's organizations within the State and on a national level. On a national level, advertising should be carried in major minority and feminist publications.

Findings: Training Programs in Television

In addition to participating in summer training programs offered in other States, several Montana TV stations offer summer apprenticeship training programs. Thus far these training programs have failed to enroll and graduate minorities, qualified by Montana TV standards, to hold on-camera positions such as moderators or off-camera positions such as producers.

Recommendation 3

Local TV stations in Montana should accept the recommendation of Ray Murdock, director of Motivation Through Communication in Duluth, Minn. He recommended that TV stations establish individual training programs in coordination with Native American studies programs at State colleges and universities. Stations should also actively seek female trainees through women's studies programs at State colleges and universities.

IMAGERY IN THE MONTANA MEDIA

Findings: General

The Advisory Committee found that many newspapers print articles concerning women which are biased and tend to depict them in traditional sex-stereotyped roles or in a negative fashion whenever women do not fit traditional sex roles. The Advisory Committee found that newspapers print uncomplimentary photographs of women in nontraditional roles, occupations, and endeavors. The Advisory Committee also found that some newspapers present unbalanced reporting

or no reporting on minority issues and projected false or negative images of minorities.

In addition, the Advisory Committee found that local TV programming is not responsive to the needs of minorities and women.

Recommendation 4

The media should provide increased and objective coverage of women's and minority issues in broadcasting and newspaper reporting. Some interested minority women's groups could assist the media in efforts to insure objective news reporting, but the primary responsibility should be that of the media. The Montana Women's Political Caucus, the National Organization for Women, Women in Communications, and other groups interested in the fair portrayal of women by the media should establish a media task force in the State. The National Organization for Women's media task force coordinator can be contacted for consultation and cooperation purposes through the NOW National Office, 5 South Wabash, Suite 1615, Chicago, Ill. 60603, (312) 322-1954. Women in Communication can be contacted at 8305-A Shoal Creek Blvd., Austin, Tex. (513) 452-0119.

Similarly, local Native American community organizations should create a media task force in Montana. Native American groups should contact the American Indian Press Association in Washington, D.C. and Ray Murdock, of Motivation Through Communication in Duluth, Minn., for assistance and cooperation.

The proposed media task forces could examine all aspects of broadcast programming and newspaper reporting to identify possible biases which result in negative depiction of women and minorities. The task forces could also work cooperatively with local TV stations and newspapers to initiate needed changes in programming or reporting.

The Montana Press Association, Montana Chapter of the National Association of Broadcasters, Great Falls Newspaper Guild, American Women in Radio and Television, Women in Communications, and Native American Newspaper Publishers should organize a group similar to the Minnesota Press Council, Saint Paul, Minn. The purpose of the organization would be to assist newspapers and television stations to

maintain the highest quality of objective reporting whenever it relates to the public interest. Specifically, the group could accept grievances from women and minorities who believe that they have been victims of biased newspaper reporting or broadcasting. The organization could resolve grievances brought to its attention. After formation, the group might wish to investigate other issues affecting minorities and women such as media employment and affirmative action plans. The Minnesota Press Council may be consulted for further information through Gordon Spielman, 440 West Minnehaha Ave., Saint Paul, Minn.

Findings: Newspaper Imagery

The Advisory Committee found that the lack of minority reporters contributes to biased, unfair, or no news coverage of minority affairs by newspapers in Montana. They further found that newspaper reporters are sometimes insensitive to the stereotypes, myths, and issues affecting minorities and women.

Recommendation 5

In order to sensitize newspaper reporters in Montana to the concerns of Native Americans, newspaper editors should subscribe to the news release service provided by the American Indian Press Association in Washington, D.C. The releases cover many important issues facing Native Americans today. Editors should also subscribe to national Native American publications such as Akwesasne Notes and local Native American newspapers in Montana.

Newspaper personnel officers should require educational progress in Native American studies for all reporters and editors as part of ongoing personnel training. Newspaper personnel officers could utilize the instructors of the Native American Studies programs at the University of Montana and Montana State University or lay persons of the Native American community to develop and conduct programs.

Findings: Television Imagery

The Montana Advisory Committee found that although women moderate local programs, there are no locally-produced programs moderated by minorities. The lack of minority producers and visible hosts contributes to local TV

programming which is not responsive to minority community needs.

Recommendation 6

Television station general managers and public affairs directors should formulate and implement programming produced and moderated by minorities. Station general managers should work with universities and colleges in the region to recruit minorities who could be trained as moderators or producers for local TV shows. TV general managers should obtain a copy of the American Indian Media Directory from the American Indian Press Association in Washington, D.C., which would assist them in contacting and recruiting Native Americans employed in TV training centers, on filming crews, in telecasting, and as video tape operators. TV general managers should also contact the American Indian Screen Actors' Guild, Hollywood, Calif. (Jay Silverheels, president) for recruitment of Native Americans.

FEDERAL GOVERNMENT

Findings: Affirmative Action Programs of Newspapers

All representatives from the major dailies in Montana said they believe in affirmative action to increase the numbers of minorities and women employed by newspapers. However, not all of the newspapers had written affirmative action plans. The few written plans did not contain goals and timetables for the hiring, training, and promotion of minorities and women.

Recommendation 7

Major dailies in the State should contact EEOC offices in Region VIII and request information on guidelines for implementing affirmative action plans. They should also consult with the EEOC Office of Voluntary Programs in Washington, D.C. for assistance in the formulation of effective affirmative action programs which, when implemented, would begin to correct underrepresentation and underutilization of minorities and women.

Findings: Newspaper Employment Forms for EEOC

The job categories utilized by EEOC in employment reports are irrelevant to the newspaper industry's actual

job categories. Their use by the newspaper industry leads to inaccurate reporting of the number of persons they employ in various job categories by race and sex. For instance, a newspaper may report a copy reader in the clerical category when the actual occupation does not fit that category but rather the professional category.[2]

Recommendation 8

EEOC should establish alternative reporting forms for the exclusive use of the newspaper industry. Such a form should reflect actual job titles and would facilitate accurate reporting of employee job classifications by race and sex and thus strengthen affirmative action monitoring.

Findings: Federal Communications Commission (FCC)

The FCC is the only Federal regulatory agency to adopt rules prohibiting employment discrimination by its licensees. Although this action by FCC has had some positive impact on the availability of positions for minorities and women in the broadcasting industry, the agency has not effectively enforced its equal employment regulations.

The Advisory Committee found that the written affirmative action programs drafted by Montana TV stations to meet FCC requirements contain only neutral language regarding nondiscriminatory and "merit hiring" practices and lack goals and timetables. Although the TV stations are complying with FCC equal employment opportunity program guidelines, the FCC guidelines are not adequate because they lack specificity and are not result-oriented.

The EEOC-delineated job categories used by the FCC in the annual employment reports required of licensees are too broadly defined and are not based on actual positions in the industry; it is therefore extremely difficult to determine from the forms the nature of the positions occupied by minorities and women.

A 1971 study by the U.S. Commission on Civil Rights found that resolution of complaints receives a low priority in the FCC's monitoring of its nondiscrimination prohibitions. Further, the agency has not developed an effective mechanism to handle civil rights complaints. Also, despite a large number of requests to do so, the FCC

has designated for hearing only a few petitions to deny license renewal which were based on civil rights grounds. Without a hearing, challenging groups have no access to the comprehensive data employment and programming.

Since late 1973, the FCC has been in the process of developing new and comprehensive procedures which are aimed at correcting the deficiencies in its civil rights compliance program pertaining to broadcasters. However, as yet, no new procedures have been adopted.

Recommendation 9

The Advisory Committee recommends that the FCC strengthen the enforcement of its rules prohibiting employment discrimination by its licensees. Its new enforcement program should include the following:

The job categories utilized by the FCC in the annual employment reports required of licensees should be narrowly defined and based on actual industry positions.

The guidelines for licensees' equal employment opportunity programs should be strengthened. The affirmative action procedures required of licensees should be those set forth in Revised Order No. 4 by the Office of Federal Contract Compliance in the Department of Labor.[3]

The FCC should also develop appropriate enforcement mechanisms, such as compliance reports and a system of periodic compliance reviews.

The FCC should develop a more active and responsive system for processing civil rights complaints against licensees, with more emphasis on field investigation, contact with complainants, and background research concerning the entities regulated. Complaints should also be used as a continuing index of licensees' compliance with nondiscrimination prohibitions and not be allowed to remain pending until license renewal time.

Notes to Chapter V

1. Questions about the program can be addressed to George W. Jeffrey, general manager. P.O. Box 2110, Colorado Springs, Colo. (303) 634-2844.

2. U.S., Equal Employment Opportunity Commission, Affirmative Action and Equal Employment, vol. 1, January 1974, pp. 11-12.

3. 41 C.F.R.§60-2.

Broadcast Application	FEDERAL COMMUNICATIONS COMMISSION	Section VI Adopted 12/17/71
EQUAL EMPLOYMENT OPPORTUNITY PROGRAM	Name of Applicant	
Call letters of station	City and state which station is licensed to serve	

Applicants for construction permit for a new facility, for assignment of license or construction permit or for transfer of control (other than *pro forma* or involuntary assignments and transfers), and applicants for renewal of license who have not previously done so, file equal employment opportunity programs or amendments to those programs in the following exhibit. Existing licensees and permittees at the time of the effective date of this form are not required to file an equal employment opportunity program until filing for renewal of license.

PART I

Submit as Exhibit No._____the applicant's equal employment opportunity program for the station, and its network operation if the applicant operates a network, indicating specific practices to be followed in order to assure equal employment opportunity for Negroes, Orientals, American Indians, Spanish Surnamed Americans, and women in each of the following aspects of employment practice: recruitment, selection, training, placement, promotion, pay, working conditions, demotion, layoff, and termination. The program should reasonably address itself to such specific practices as the following, to the extent they are appropriate in terms of station size, location, etc. A program need not be filed if the station has less than five fulltime employees or with respect to any minority group which is represented in the area in such insignificant numbers that a program would not be meaningful. In the latter situation, a statement of explanation should be filed.

1. To assure nondiscrimination in recruiting:

   a. Posting notices in station employment offices informing applicants of their equal employment rights and their right to notify the Federal Communications Commission or other appropriate agency if they believe they have been the victim of discrimination.

   b. Placing a notice in bold type on the employment application informing prospective employees that discrimination because of race, color, religion, national origin, or sex, is prohibited and that they may notify the Federal Communications Commission or other appropriate agency if they believe they have been discriminated against.

   c. Placing employment advertisements in media which have significant circulation among minority-group people or women in the recruiting area.

   d. Recruiting through schools and colleges with significant minority-group or women enrollments.

   e. Maintaining systematic contacts with women's, minority and human relations organizations, leaders and spokesmen to encourage referral of qualified minority and women applicants.

   f. Encouraging present employees to refer women and minority applicants.

   g. Making known to all recruitment sources that qualified women and minority members are being sought for consideration whenever the station hires.

2. To assure nondiscrimination in selection and hiring:

   a. Instructing personally those of your staff who make hiring decisions that women and minority applicants for all jobs are to be considered without discrimination.

   b. Where union agreements exist:

      (1) Cooperating with your unions in the development of programs to assure qualified minority persons of equal opportunity for employment;

      (2) Including an effective nondiscrimination clause in new or re-negotiated union agreements.

   c. Avoiding use of selection techniques or tests which have the effect of discriminating against women and minority groups.

3. To assure nondiscriminatory placement and promotion:

   a. Instructing personally those of the station staff who make decisions on placement and promotion that women and minority employees are to be considered without discrimination, and that job areas in which there is little or no female or minority representation should be reviewed to determine whether this results from discrimination.

   b. Giving women and minority group employees equal opportunity for positions which lead to higher positions. Inquiries as to the interest and skills of all lower paid employees with respect to any of the higher paid positions, followed by

(CONTINUED ON NEXT PAGE)

assistance, counselling, and effective measures to enable employees with interest and potential to qualify themselves for such positions.

c. Reviewing seniority practices and seniority clauses in union contracts to insure that such practices or clauses are nondiscriminatory and do not have a discriminatory effect.

4. To assure nondiscrimination in other areas of employment practices:

a. Examining rates of pay and fringe benefits for present employees with equivalent duties, and adjusting any inequities found.

b. Advising all qualified employees whenever there is an opportunity to perform overtime work.

PART II

Assignors and transferors other than in the case of *pro forma* or involuntary assignments and transfers, and renewal applicants file the following exhibit:

Submit a report as Exhibit____ indicating the manner in which the specific practices undertaken pursuant to the station's equal employment opportunity program have been applied and the effect of these practices upon the applications for employment, hiring and promotions of women and minority group members.

PART III

Assignors, transferors and applicants for renewal file the following exhibit:

Submit as Exhibit____ a brief description of any complaint which has been filed before any body having competent jurisdiction under Federal, State, territorial or local law, alleging unlawful discrimination in the employment practices of the applicant, including the persons involved, the date of filing, the court or agency, the file number (if any), and the disposition or current status of the matter.

Appendix B

Annual Employment Report

Each year, beginning in 1971, radio and television stations must submit by May 31 an Annual Employment Report to the FCC giving a statistical breakdown of minority group employees by job category. One section of the report form is included here. It should give you an idea of the information you can expect to find in the public file at your local stations.

SECTION III - FULL-TIME PAID EMPLOYEES (applicable to all respondents)

JOB CATEGORIES[1]	ALL EMPLOYEES[2]			MINORITY GROUP EMPLOYEES							
				MALE				FEMALE			
	Total (Col. 2+3) (1)	Male (2)	Female (3)	Negro (4)	Oriental (5)	American Indian[3] (6)	Spanish Surnamed American (7)	Negro (8)	Oriental (9)	American Indian (10)	Spanish Surnamed American (11)
Officials and managers											
Professionals											
Technicians											
Sales workers											
Office and clerical											
Craftsmen (Skilled)											
Operatives (Semi-skilled)											
Laborers (Unskilled)											
Service workers											
TOTAL											
Total employment from previous report (if any)											

[1] Refer to instructions for explanation of all title functions.

[2] Include "Minority Group Employees" and others. See instruction 6.

[3] Eskimos and Aleuts with "American Indian."

Appendix C

FEDERAL COMMUNICATIONS COMMISSION	Section IV-B
STATEMENT OF TELEVISION PROGRAM SERVICE	Name of Applicant
Call letters of station	City and state which station is licensed to serve

PART I

Ascertainment of Community Needs

1. A. State in Exhibit No.____ the methods used by the applicant to ascertain the needs and interests of the public served by the station. Such information shall include (1) the major communities or areas which applicant principally undertakes to serve and (2) identification of representative groups, interests and organizations which were consulted.

   B. Describe in Exhibit No.____ the significant needs and interests of the public which the applicant believes his station will serve during the coming license period, including those with respect to national and international matters.

   C. List in Exhibit No.____ typical and illustrative programs or program series (excluding Entertainment and News) that applicant plans to broadcast during the coming license period to meet those needs and interests.

   D. Describe in Exhibit No.____ the procedures applicant has or proposes to have for the consideration and disposition of complaints or suggestions coming from the public.

NOTE: Sufficient records shall be kept on file at the station, open for inspection by the Commission, for a period of 3 years from the date of filing of this statement (unless requested to be kept longer by the Commission) to support the representations required in answer to Question 1, A, B, and C. These records should not be submitted with this application and need not be available for public inspection.

PART II

Past Programming

2. A. State the total hours of operation during the composite week: _____

   B. Attach as Exhibit No.____ one exact copy of the program logs for the composite week used as a basis for responding to questions herein. Applicants utilizing automatic program logging devices must comply with the provisions of Section 73.670(c). Automatic recordings will be returned to the applicant. Exact copies of program logs will not be returned.

   If applicant has not operated during all of the days of the composite week which would be applicable to the use of this form, applicant should so notify the Commission and request the designation of substitute day or days as required.

3. A. State the amount of time (rounded to the nearest minute) the applicant devoted in the composite week to the program types (see Definitions) listed below. Commercial matter within a program segment shall be excluded in computing time devoted to that particular program segment (e.g., a 15-minute news program containing 3 minutes' commercial matter shall be counted as a 12-minute news program).

	Hours	Minutes	% of Total Time on Air
(1) News	_____	_____	_____ %
*(2) Public Affairs	_____	_____	_____ %
*(3) All other programs, exclusive of Entertainment and Sports	_____	_____	_____ %

   * Attach as Exhibit No.____ a brief description of each program included in these categories.

   B. If in the applicant's judgment the composite week does not adequately represent the station's past programming, applicant may in addition provide in Exhibit No.____ the same information as required in 3-A above (using the same format) for a representative period during the year preceding the filing of this application. Applicant shall identify the time period used. Applicant need not file the program logs used in responding to this question unless requested by the Commission.

4. List in Exhibit No.____ typical and illustrative programs or program series (excluding Entertainment and News) broadcast during the year preceding the filing of this application which have served public needs and interests in applicant's judgment. Denote, by underlining the Title, those programs, if any, designed to inform the public on local, national or international problems of greatest public importance in the community served by the applicant. Use the format below. (*NOTE:* If applicant's response includes any program described in Question 3, give title of program and refer to that Question without further details.)

   A. Title:
   B. Source*:
   C. Type*:
   D. Brief description:
   E. Time broadcast & duration:
   F. Number of times broadcast:
   G. Extent, if any, to which community leaders or groups involved:

5. State below the amount of time (in hours and minutes) by source* for programs in the composite week. (The response shall be in terms of total program time, including commercial matter.)

	Local	Network	Recorded
8 a.m. - 6 p.m.			
6 p.m. - 11 p.m.			
All other hours			

*See Definitions